National Indian Gaming Commission

NATIONAL TRAINING CONFERENCE

NTC 2023

START TIME	NIGC National Training Conference Agenda	
	DAY ONE	
8:30	**Welcome/Ice Breaker**	
9:00	**Leadership Discussion**	
10:00	*30-Minute Break*	
10:30	**How to Avoid an IGRA Violation**	
12:00	***Lunch (On Your Own)***	
	AUDIT TRACK	**COMPLIANCE TRACK**
1:00	**IT Findings and Best Practices**	**Risk Assessments**
2:00	*15-Minute Break*	
2:15	**Cybersecurity Incident Response Plans**	**Risk Assessments (Continued)**
3:15	*15-Minute Break*	
3:30	**Cybersecurity Incident Response Plans (Continued)**	**Ethical Considerations for Regulators**
4:30	**DAY ONE: Wrap-up and Q&A**	
	DAY TWO	
8:30	**Top 10 Audit Findings**	**Panel: The Regulatory Landscape**
9:30	*15-Minute Break*	
9:45	**Intent and Testing: Bingo Toolkit**	**Criminal History Record Information (CHRI) and Compliance with 25 CFR Part 558.3(e)**
10:45	*15-Minute Break*	
11:00	**Intent and Testing: Bingo Toolkit (Continued)**	**Essential Roles of a Regulator**
12:00	***Lunch (On Your Own)***	
1:00	**Panel: Roundtable Discussion with Internal Audit Professionals**	**Report Writing**
2:00	*15-Minute Break*	
2:15	**Critical Thinking: Enhancing the Internal Audit**	**Background Investigations: Eligibility Determination for Nuanced Standards**
3:15	*15-Minute Break*	
3:30	**Critical Thinking: Enhancing the Internal Audit (Continued)**	**Background Investigations: Eligibility Determination for Nuanced Standards (Continued)**
4:30	**DAY TWO: Wrap-up and Q&A**	

DAY THREE	
8:30	**NIGC Authorities in EPHS**
9:30	*15-Minute Break*
9:45	**Emergency Preparedness Panel**
10:45	*15-Minute Break*
11:00	**Introduction to Emergency Preparedness Plans**
12:00	***Lunch (On Your Own)***
1:00	**Government Agency Panel Discussion**
2:00	*15-Minute Break*
2:15	**Collaborative Approach to Combatting Human Trafficking**
3:15	*Event Concludes*

COURSE DESCRIPTIONS

Leadership Discussion

This regional and national update will give attendees on understanding of the hot button issues facing our industry, from areas of concern to technological updates, to an open format that welcomes your questions.

Intended Audience: All

How to Avoid an IGRA Violation

The Indian Gaming Regulatory Act has specific areas where non-compliance can lead a Tribe to a violation. The best way to ensure your operation remains compliant is to know the common problems and the best ways to avoid them. Join our Office of General Counsel as they point out the pitfalls and give you timely tips for success.

Intended Audience: All

Audit Track

Course listing in order of schedule

Information Technology Audit Findings and Best Practices to Remediate Risk

Information Technology issues continue to be one of the highest reported findings submitted to the NIGC through external reporting. This course provides an overview of the most repeated findings in the gaming industry. Hear from our IT professionals as they discuss the top findings and give you the tools to determine intent and testing requirements essential to remediate information technology non-compliance.

Intended Audience: IT Professionals, Internal Auditors, and Tribal Gaming Regulatory Authorities

Cyber Security Incident Response Plans

It is not a matter of if, but when! A cyber-attack can happen at any moment in an operation – will you know what to do? Incident response plans are critical to overcome and limit the damage an incident can cause. This interactive course will challenge you to bring your critical thinking skills, which will guide you in the development of an incident plan that you can take back to your facility.

Intended Audience: Tribal Gaming Regulators, Operations Personnel, IT Professionals, Risk and Safety Personnel

Top 10 Audit Findings

Do you have audit findings on our Top 10? Don't know? Find out in this presentation of the Top 10 most common audit findings as identified through annual AUP independent audit reports, internal audit reports and NIGC internal control assessments. This course will cover the intent of the control, and provides specific instructions and exercises focusing on identifying and correcting findings. You will leave with an increased understanding of and ability to identify and remedy like findings at your gaming operations.

Intended Audience: Tribal Regulators, Auditors, Casino Operations

Intent and Testing: Bingo Toolkit

Understanding the intent of a standard is the first step in ensuring appropriate testing is occurring. Join us as we go through the Bingo Tool Kit where we will discuss how it can be used, engage in practical exercises, and discuss the intent and testing process to help build better controls and testing methods. This course will help tribal regulators, internal auditors,

and operations personnel to better understand the MICS for class II gaming.

Intended Audience: Internal Auditors, Operations, and Regulator Personnel

Panel: Roundtable Discussion with Internal Audit Professionals

Join this panel of internal audit professionals as they discuss the current landscape of the Internal Audit process for their gaming operations. Dive into the issues they face and hear how they have overcome these challenges.

Intended Audience: Internal Auditors, Operations Personnel, Regulators, and those interested in Internal Audit

Critical Thinking: Enhancing the Internal Audit

Looking to improve your skills? Then we have the course for you. This course increases your understanding of objective and critical thinking skills necessary to evaluate and test a standard to ensure testing is appropriate. The course is intended for experienced operations and regulatory compliance personnel with a working understanding of the internal audit process.

Intended Audience: Internal Auditors, Operations and Regulatory Compliance

Risk Assessments

Not that risk is everywhere, but it is… In this course, we will discuss risk assessments and lead participants to discover their risk and apply resources over high-risk areas to limit exposure to potential violations. This activity-based session will help you start the conversation about strengths, weakness, opportunities and threats with your team!

Intended Audience: Tribal Leadership, Commissioners, and TGRA staff

Ethical Considerations for Regulators

The wonderful world of gaming is full of shinny things and freebees… or is it? In this course, we will dive into ethics and tools for navigating ethical situations. Daily, TGRA's and Commissioners may encounter situations where ethical decisions come into play. We will start the conversation on building an ethical culture within your department, and share real-life examples and lessons learned when encountering common ethical issues.

Intended Audience: Tribal Leadership, Commissioners, and Tribal Gaming Regulatory Authorities

Panel: The Regulatory Landscape

Join this panel of regulatory professionals as they discuss all the trending topics facing the Indian gaming industry. Hear from the panelist on how they are addressing the challenges as the landscape continues to change.

Intended Audience: All

Criminal History Record Information (CHRI) and Compliance with 25 CFR Part 558.3(e)

Join staff from the NIGC Criminal Justice Information Services Audit Unit (CAU) for a discussion about CHRI and compliance with 25 CFR Part 558.3(e).

Intended Audience: Background and Licensing Personnel, LASO's and other Regulatory Personnel

Essential Roles of a Regulator

Regulators like all staff in gaming operations are asked to perform many tasks. Being an expert in all things gaming is difficult, if not impossible. Let us break down some essential

roles of regulators to ensure compliance. We will also look at some areas throughout the gaming operation that have valuable reports (i.e. revenue audit, surveillance, internal audit) to help in your day-to-day activities.

Intended Audience: Tribal Leadership, Commissioners and Tribal Gaming Regulatory Authorities

Report Writing

Tired of the same old report writing class? Well, this is just like those… only fun! Designed for both experienced and new TGRA staff as well as any tribal gaming department that writes reports, we have filled this hands-on, activity-based course with information to improve report-writing skills.

Intended Audience: Tribal Gaming Regulatory Authorities, Security, Surveillance, and Commissioners

Background Investigations: Eligibility Determination for Nuanced Standards

What do you think when you hear Reputation, Habits, and Associations? What about Prior Activities? Join us as we look at the nuanced language of the Background Investigations for PMO/KE. You will work together in this interactive course, using critical thinking skills to develop a process to bring back to your operations.

Intended Audience: Background and Licensing Personnel, Regulatory Personnel, individuals interested in developing processes

Emergency Preparedness Workshop

Course listing in order of schedule

NIGC Authorities in EPHS

In this session, you will learn about how IGRA and the NIGC's authority in Environmental Public Health and Safety (EPHS) intersect through its interpretive rule, which states that the construction and maintenance of the gaming facility and the operation of that gaming is conducted in a manner, which adequately protects the environment and the public health and safety. We will also discuss the importance of your Facility License and review the EPHS Checklist.

Intended Audience: Risk and Safety Personnel, Operations, Security, and Regulator Personnel

Emergency Preparedness Panel

In this session, you will hear from industry professionals, who lead emergency preparedness for their tribal casino organizations. They will discuss the importance of effective team building, training and collaboration to achieve emergency preparedness in addition to identifying who makes command decisions, the command structure and identify the primary decision makers.

Intended Audience: Risk and Safety Personnel, Operations, Security, and Regulator Personnel

Introduction to Emergency Preparedness Plans

This session is designed to guide tribal regulatory commissions and staff, casino team members and management in the response to critical and emergency situations. The NIGC's Emergency Preparedness Response Plan model template will be reviewed and shared. The primary purpose is to protect team members and guests. This plan establishes a command structure so sound decisions can be made effectively and promptly communicated to employees and guests.

Intended Audience: Risk and Safety Personnel, Operations, Security, and Regulator Personnel

Government Agency Panel Discussion

In this session, you will hear from the government agencies, IHS Division of Environmental Health Services who will discuss their role in partnerships with tribal casino health and food safety in addition to offices of emergency service leaders and topics.

Intended Audience: Risk and Safety Personnel, Operations, Security, and Regulator Personnel

Collaborative Approach to Combatting Human Trafficking

In this session, the NIGC will provide agency updates on the training they developed specific Human Trafficking indicators in the tribal gaming industry and the collaborative efforts taking place between NIGC, DHS and BIA in addition to tribes that are actively working on Human Trafficking awareness and education in their communities.

Intended Audience: Risk and Safety Personnel, Operations, Security, and Regulator Personnel

Leadership Discussion

NIGC National Training Conference Evaluation

Course Name: Leadership Discussion

NIGC greatly appreciates your feedback to aid in our Training offerings.

When filling out the evaluation, please use the ranking scale of 1-5 as noted.	***1 Extremely Dissatisfied***	***2 Dissatisfied***	***3 Neutral***	***4 Satisfied***	***5 Extremely Satisfied***
Did the training meet your expectations?					
Presentation materials were useful/effective. (i.e., PowerPoint, videos, handouts, etc.)					
Presentations and materials are clear.					
Overall I would rate the presentations:					
Was the presenter(s) knowledgeable in the subject matter?					
Overall, I would rate the presenter(s):					

Please provide additional details relevant to your scores above.

How do you feel NIGC can improve for future trainings?

Please list any recommendations for future training topics.

Note Pages

The Requirements of IGRA & How to Avoid a Violation Participant Guide

How to Avoid an IGRA Violation Participant Guide

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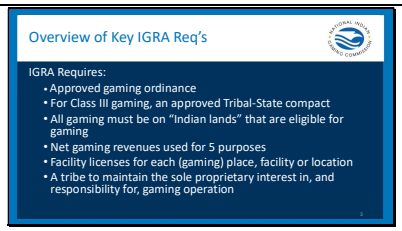
Slide 2		
Slide 3		

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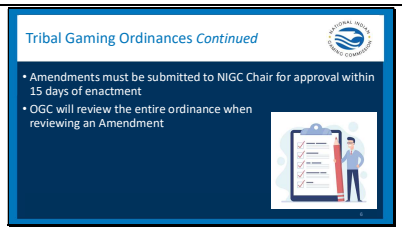
Slide 6		

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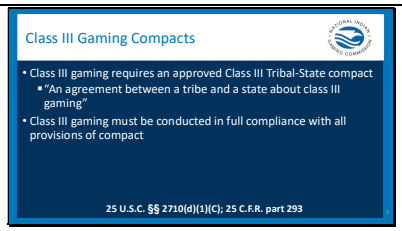
Slide 8		
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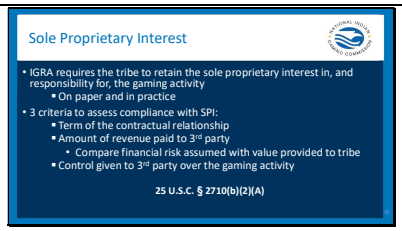
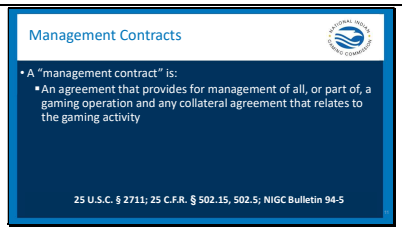
Slide 10		
Slide 11		
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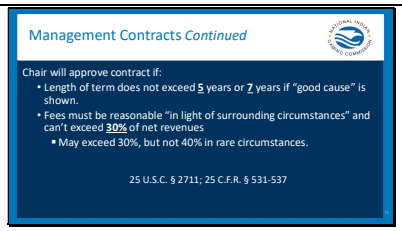
Slide 14		
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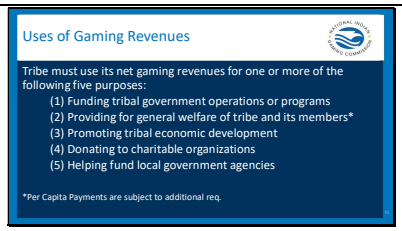
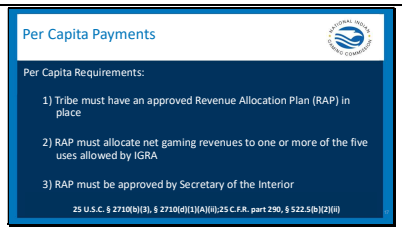
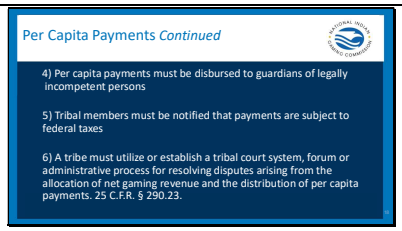
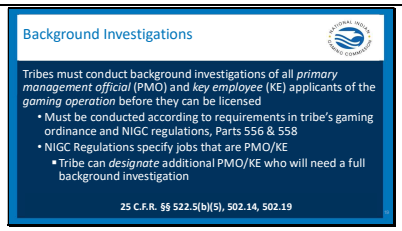
Slide 16		
Slide 17		
Slide 18		

Slide 19		
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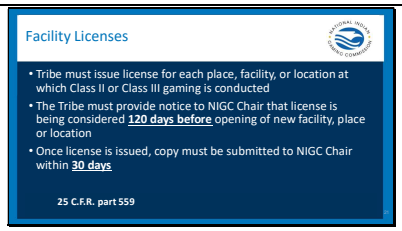
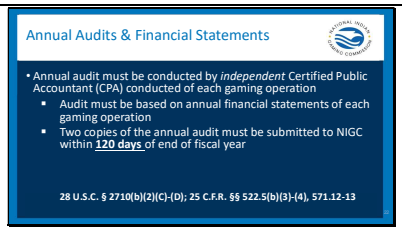
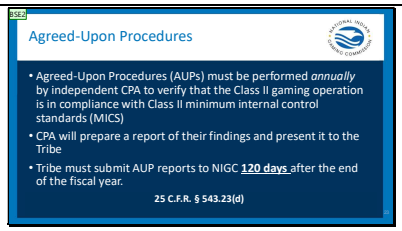
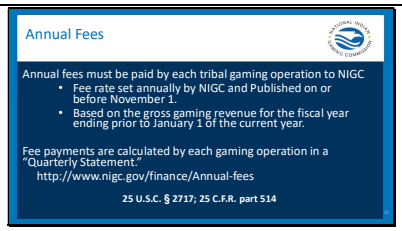
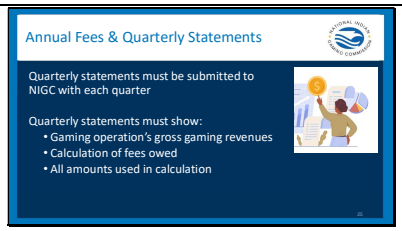
Slide 21		

Slide 22		
Slide 23		
Slide 24		

Slide 25		
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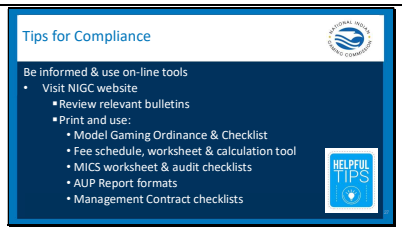
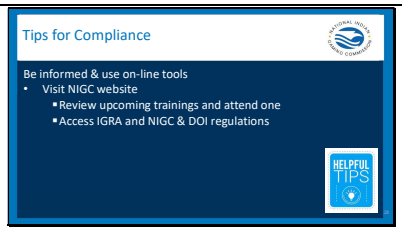
Slide 27		

Slide 28		
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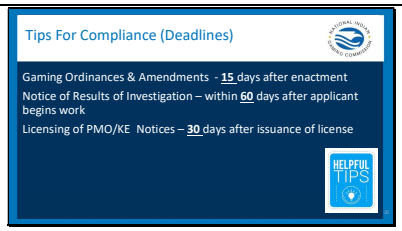
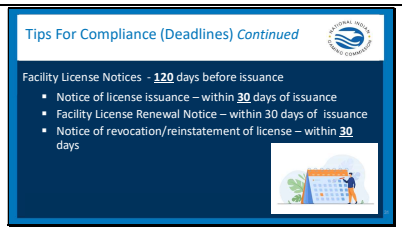
Slide 30		

Slide 31		
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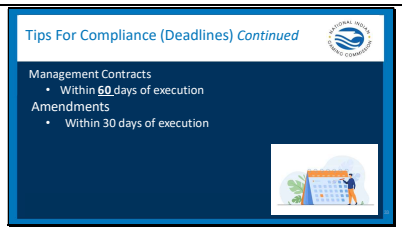
Slide 33		

NIGC National Training Conference Evaluation

Course Name: How to Avoid an IGRA Violation

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Presentations and materials are clear.					
Overall I would rate the presentations:					
Was the presenter(s) knowledgeable in the subject matter?					
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Please provide additional details relevant to your scores above.

How do you feel NIGC can improve for future trainings?

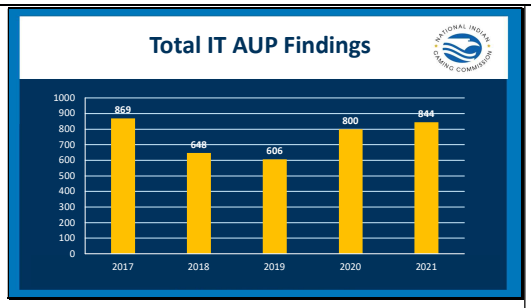
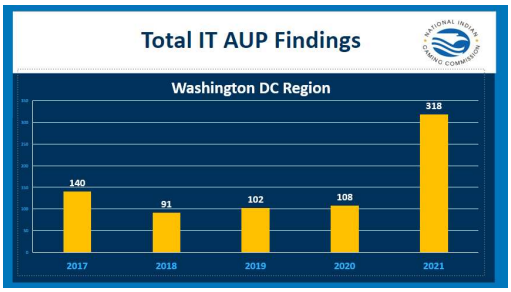
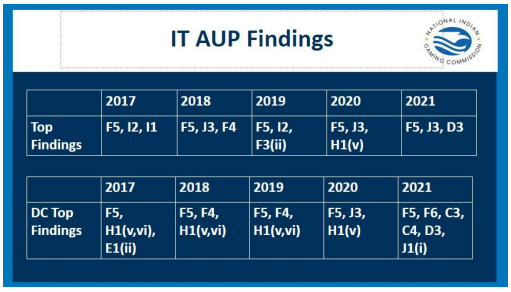
Please list any recommendations for future training topics.

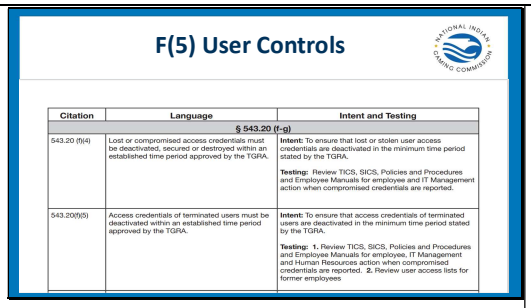
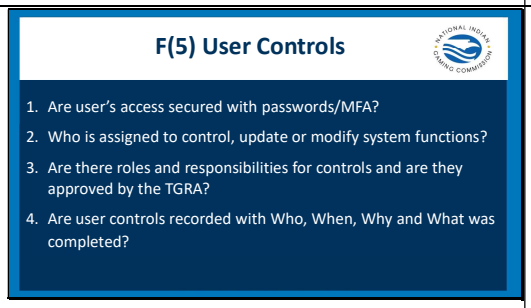
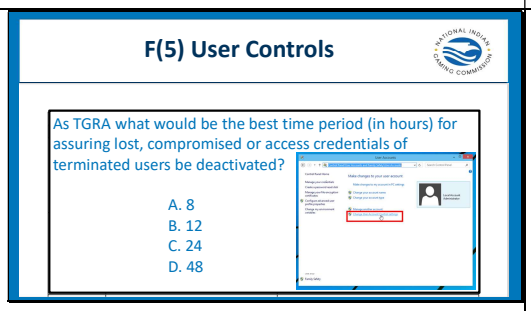
Note Pages

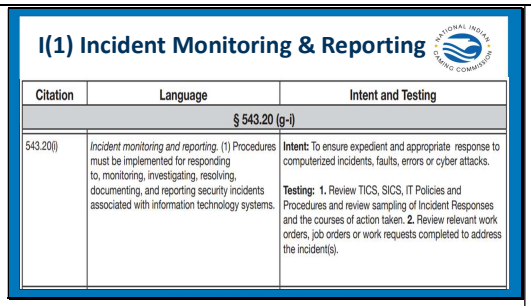
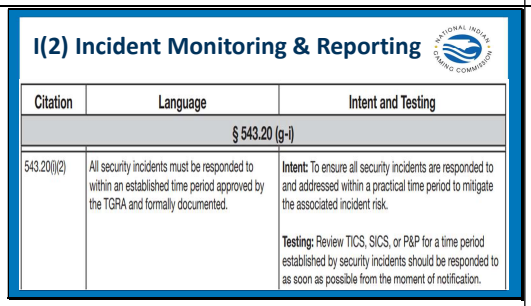
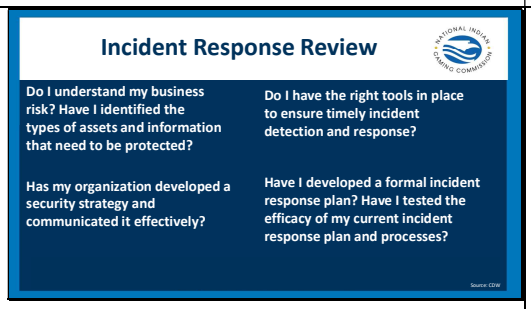
IT Findings and Best Practices
Participant Guide

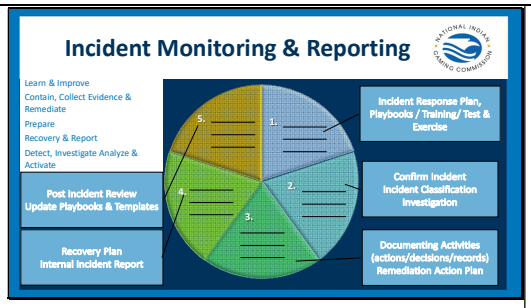
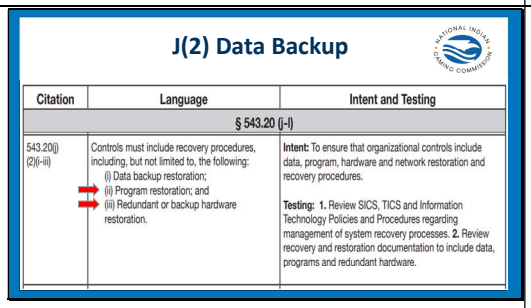
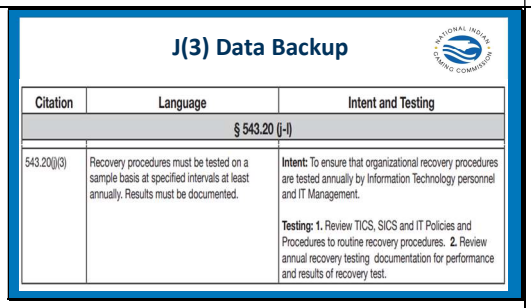
IT Findings and Best Practices Participant Guide

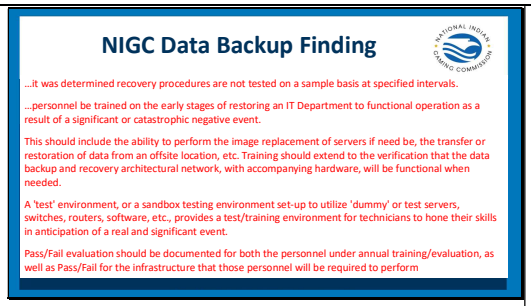
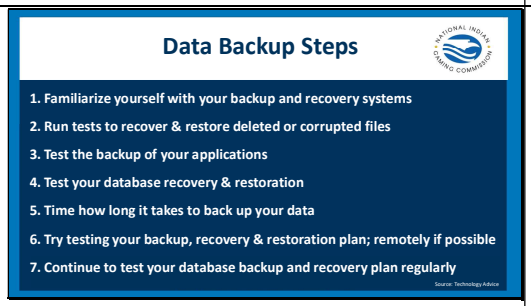
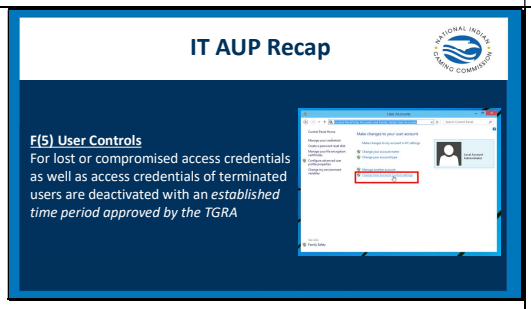
Slide 1		**PARTICIPANT QUESTION CHALLENGE** The time allotted for this virtual training will allow each of you to ask questions. I challenge each of you to ask a question! Your participation will make this training a success today!
Slide 2		**Key Points** Rather than discuss specific types of trending attacks and vulnerabilities, in this course we aim to take a different approach. We will be looking at specific data/events/timelines of successful cyber-attacks within Indian Country in recent years, and then by reviewing what happened in those attacks we will discuss lessons learned, ways to reduce the chance of a similar attack, and uncover possible lapses in compliance.

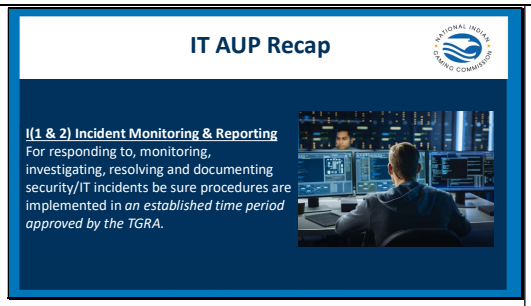
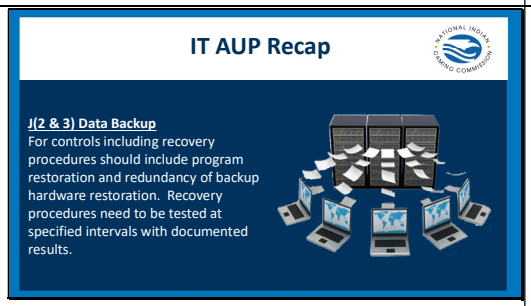
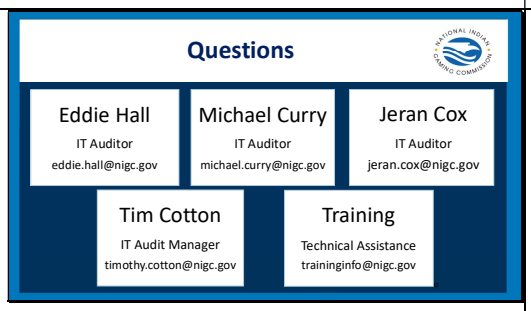
Slide 3		**Key Points** Information Technology Agreed Upon Procedures number of findings by year.
Slide 4		**Key Points** Information Technology Agreed Upon Procedures number of findings by year for the Washington D.C. Region.
Slide 5		**Key Points** Common IT Findings per year nationally and for the Washington D.C. Region.

Slide 6		**Key Points** Over the past 5 years, User Controls is a common finding that continue to show up on the AUPs. Why are User Controls a finding to overcome?
Slide 7		**Key Points** Some thoughts to think about when reviewing policies and procedures around User Controls.
Slide 8		**Key Points** Answer question

Slide 9		**Key Points** Do you have procedures implemented for responding to, monitoring, investigating, resolving, documenting and reporting security incidents and/or cyberattacks?
Slide 10		**Key Points** Security Incidents should be responded to within a timeframe from the moment of notification.
Slide 11		**Key Points** Some questions to consider when reviewing incident response plan?

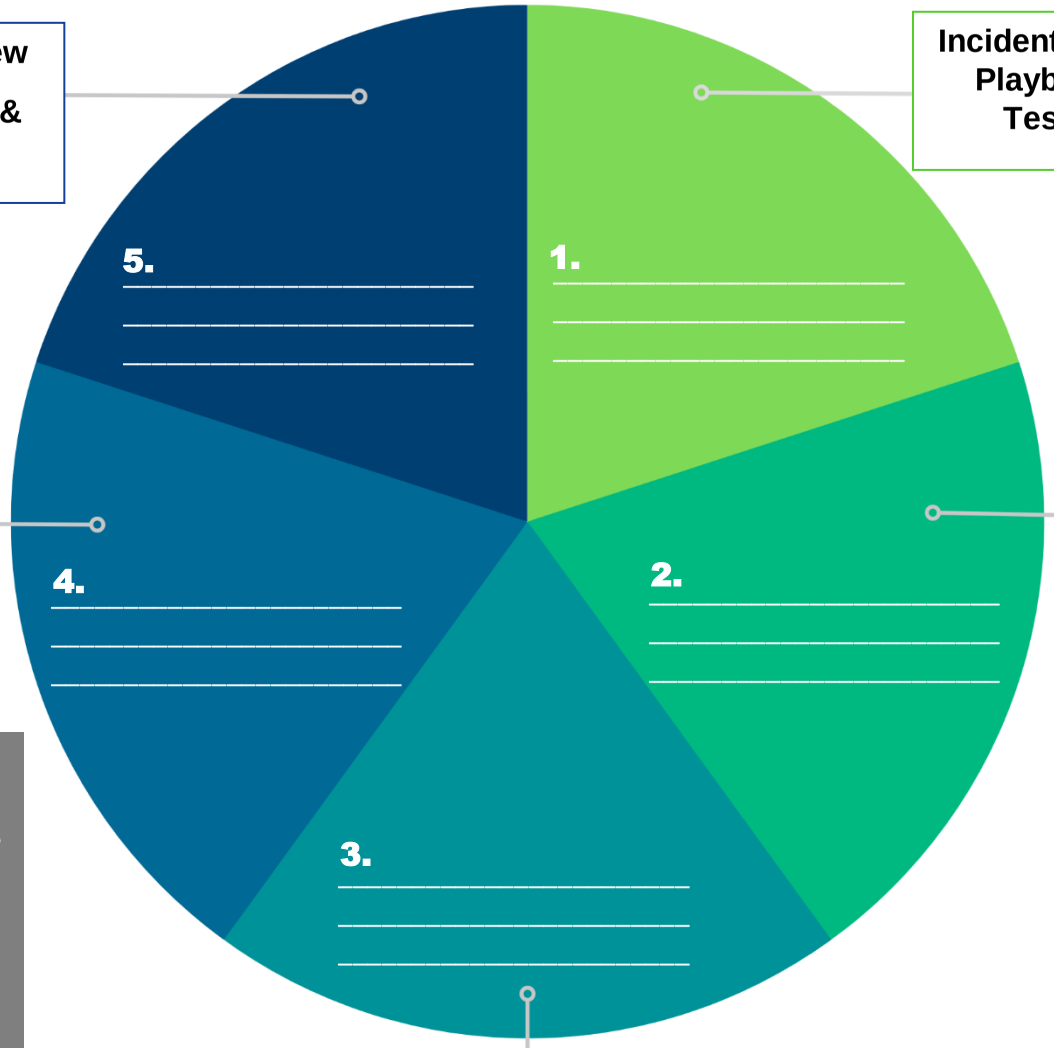
Slide 12		**Key Points** See Handout insert at end of the slide pages. Fill in the blank with one of the phrases in the white box for each description with one of the 5 elements for each portion of the pie chart. Use this handout to collect your thoughts and gather notes to take back to use at your property.
Slide 13		**Key Points** Do we have controls including recovery procedures with restoration and redundant backup?
Slide 14		**Key Points** Review recovery testing documentation for performance and results of recovery testing.

Slide 15		**Key Points** Portion of an actual NIGC finding on data backups along with recommendation.
Slide 16		**Key Points** Review of Data Backup processes to ensure all bases are covered.
Slide 17		

Slide 18		
Slide 19		
Slide 20		

Information Technology Findings and Best Practices – Handout

Instructions: Review the process wheel below. Using the phrases in the grey box, write the correct phrase matching the corresponding process indicated.



Incident Response Plan, Playbooks,Training Test & Exercise

Confirm Incident

Incident Classification

Investigation

Documenting Activities
(actions/decisions/records)
Remediation Action Plan

Recovery Plan

Internal Incident Report

Post Incident Review

Update Playbooks & Templates

- Learn & Improve
- Contain, Collect Evidence & Remediate
- Prepare
- Recovery & Report
- Detect, Investigate, Analyze & Activate

NIGC National Training Conference Evaluation

Course Name: IT Findings and Best Practices

NIGC greatly appreciates your feedback to aid in our Training offerings.

When filling out the evaluation, please use the ranking scale of 1-5 as noted.	***1 Extremely Dissatisfied***	***2 Dissatisfied***	***3 Neutral***	***4 Satisfied***	***5 Extremely Satisfied***
Did the training meet your expectations?					
Presentation materials were useful/effective. (i.e., PowerPoint, videos, handouts, etc.)					
Presentations and materials are clear.					
Overall I would rate the presentations:					
Was the presenter(s) knowledgeable in the subject matter?					
Overall, I would rate the presenter(s):					

Please provide additional details relevant to your scores above.

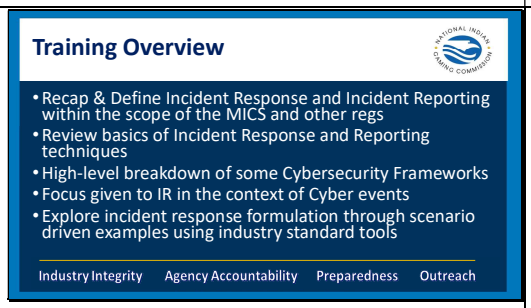
How do you feel NIGC can improve for future trainings?

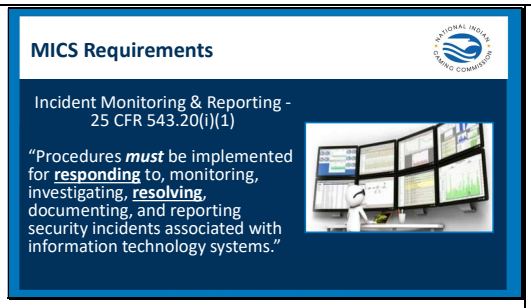
Please list any recommendations for future training topics.

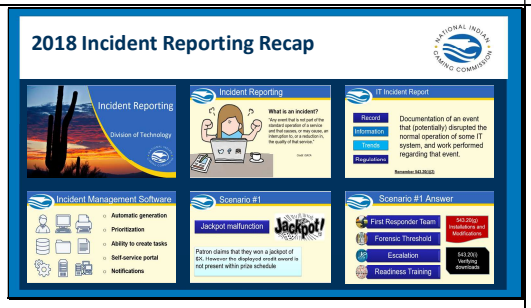
Note Pages

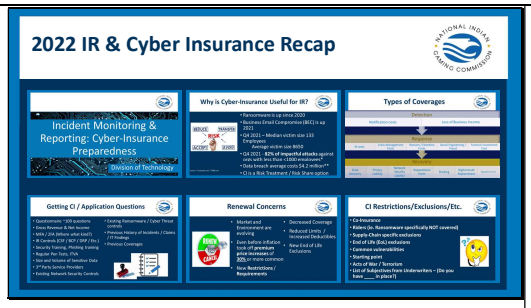
Cyber Security Incident Response Plans Participant Guide

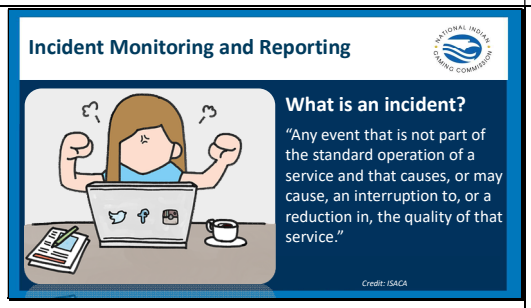
Cyber Security Incident Response Plans Participant Guide

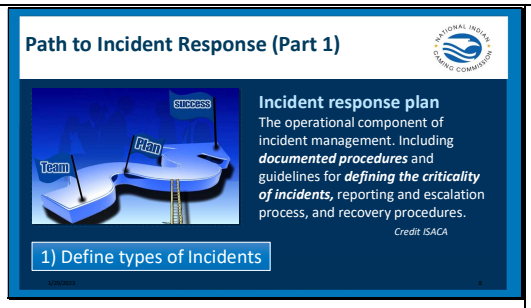
Slide 1		**KEY POINTS** It is not a matter of if but when! A cyber-attack can happen at any moment in an operation, will you know what to do? Incident response plans are critical to overcome and limit the damage an incident can cause. This interactive course will challenge you to bring your critical thinking skills, and assist in the development of an incident plan that you can take back to your facility.
Slide 2		**KEY POINTS** Recap & Define Incident Response and Incident Reporting within the scope of the MICS and cyber security frameworks Identify why we need Incident Reporting Review basics of Incident Response and Reporting techniques Explore incident response formulation through scenario driven examples using industry standard tools.

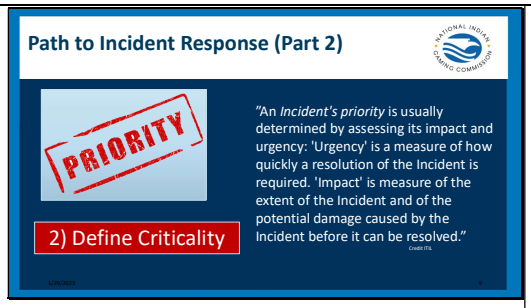
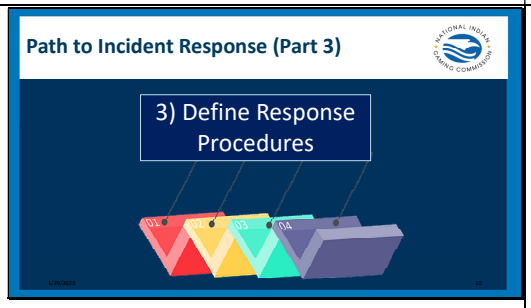
Slide 3		**KEY POINTS** **(i) *Incident monitoring and reporting.*** • **Procedures must be implemented (SICS need to be developed)** for *responding* to, *monitoring*, *investigating*, *resolving*, *documenting*, and *reporting* security incidents associated with information technology systems. (2) All security incidents must be responded to within an **established** time period **approved** by the TGRA and formally **documented**. A lot contained in 543.20(i)(1) **Responding** Monitoring Investigating **Resolving** Documenting Reporting Many Different things can constitute a security incident. Hardware failure, weather events, internal threats, external threat actors just to name a few. How do we deal with this, by having robust procedures in places to deal with the variety of incidents

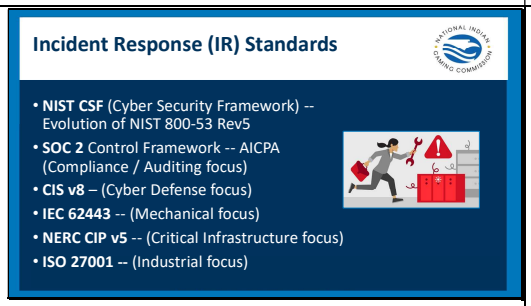
Slide 4		**KEY POINTS** Here are a few of the additional requirements laid out in the FBI's CSP 5.9.1 5.3.1 Reporting Security Events 5.3.2 Management of Security Incidents 5.3.2.1 Incident Handling 5.3.3 Incident Response Training 5.3.4 Incident Monitoring 5.13.5 Incident Response (Mobile https://www.fbi.gov/file-repository/cjis_security_policy_v5-9-1_20221001.pdf/view
Slide 5		**KEY POINTS** A recap of the 2018/2019 training on Incident Reporting: We covered the importance of Incident Response and dove into one responsibility within the MICS… **<u>Incident Reporting</u>** While we did cover many different scenarios and IR steps and types of remediation…we did not cover every imaginable one. One we did not get into enough detail in was the topic of cyber security incidents so…

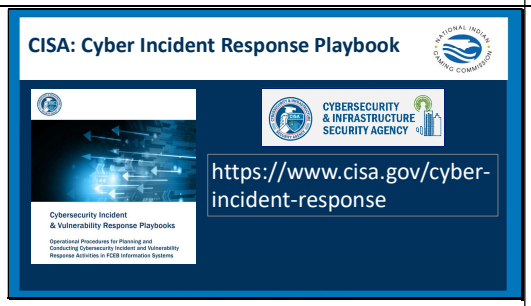
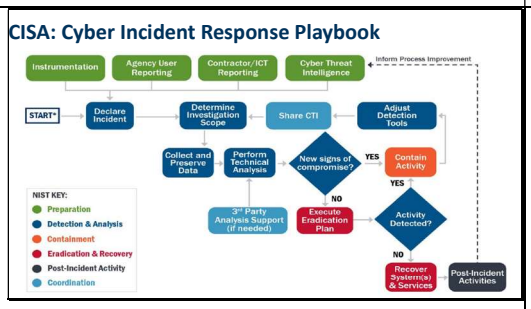
Slide 6		**KEY POINTS** A recap of the 2022 training on IR and Cyber Insurance: We covered the importance of one aspect of IR and the value of Cyber Insurance as a tool to supplement and fortify your Incident response policies and procedures and some of the tips and challenges of obtaining or renewing an insurance policy.

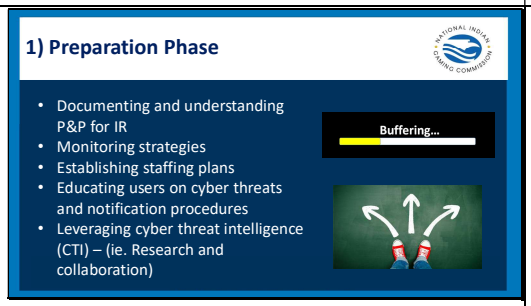
Slide 7		**KEY POINTS**
		• **A very broad definition of what is an incident - ISACA's** definition of Incident.
		• **Additional resources for official strategies:**
		  • NIST Special Publication 800-61-r2
		  • NIST Special Publication 800-184
		  • ISACA Incident Management and Response
		  • ITIL Service Operation
		  • ITIL IM
		  • ISO 20000-1

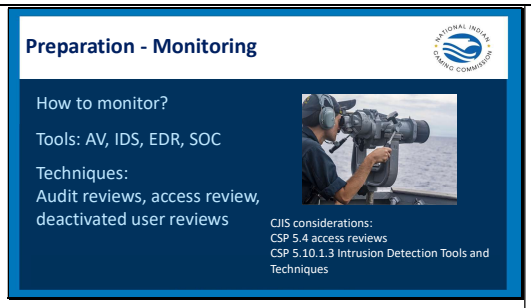
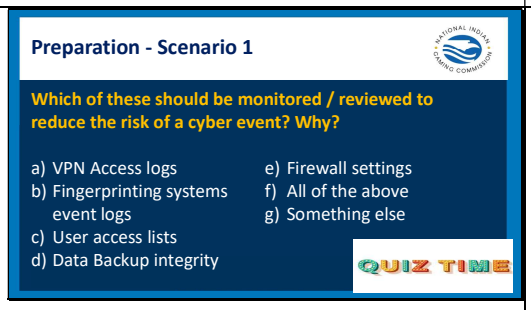
Slide 8		**KEY POINTS**
		• ISACA's definition of **Incident response plan**
		• An incident Response Plan is the operational component of incident management.
		• The plan includes documented procedures and guidelines for defining the criticality of incidents, reporting and escalation process, and recovery procedures.
		
		<u>Possible IT Incident categories</u>:
		
		• Multiple Player Card failures
		  • Unauthorized access to CHRI
		• Public facing website down
		  • IDF switch outage
		• Floor switch outage
		  • Outage in virtual server environment
		• Power outage that results in system failure
		• Hardware cooling outage
		  • Portion of any gaming floor outage
		• POS outage • Kiosk / ATM outage
		• Check / Cash Advance outage
		  • Phone outages
		• Radio outage
		  • Surveillance infrastructure outage
		• Any additional item at *discretion* of IT/GC/Operations management

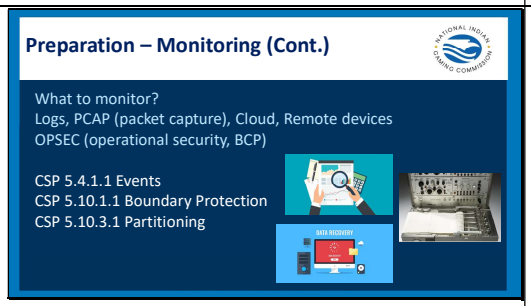
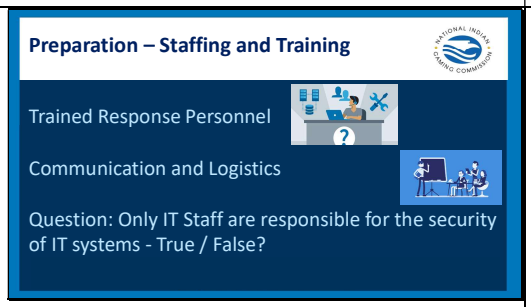
Slide 9		**KEY POINTS** • To cover incidents with the correct resources we need to define how critical the incident is. • The **ITIL's** (**Information Technology Infrastructure Library)** definition of Incident's Priority. ITIL looks at Urgency, Urgency can be defined within the SICS and SOPs, or if allowed by the SICS at the discretion of IT Management. In summary: What is the Priority and who is provides the initial support**?** **NOTE:** *Remember 543.20(a)(1) Supervision*
Slide 10		**KEY POINTS** • Another important step in the Incident Response process is defining the appropriate procedures for each type of incident. **While IT staff may know how to respond to various incidents, those response procedures are frequently lacking or nonexistent.** In summary • How do you respond? – Answer depends on the kind of issue • Who is involved? – Depends on the criticality and affected teams • Resolution and Record keeping • Ownership, monitoring, tracking, customer communication • Incident closure

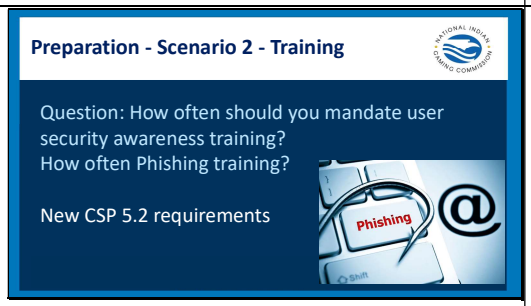
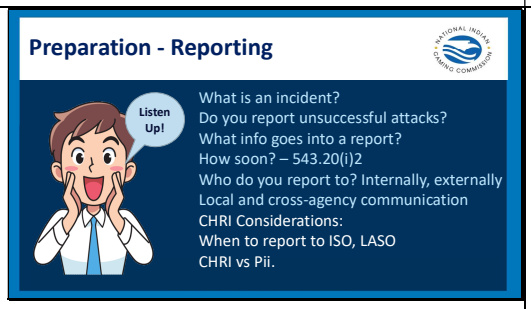
		Note: Best practices also deal with root cause analysis and remediation strategies, but those are typically not involved in the process at this stage.
Slide 11		**KEY POINTS** We have to implement IR P&P, but do not have to start from scratch. Many effective standards exist. Such as IT / IR standards and frameworks. - NIST – National Institute of Standards and Technology - CSF used extensively, advised by CISA (circa 2021) - SOC 2 -- System and Organization Controls: (AICPA) American Institute of Certified Professional Accountants - (Auditing Focused) (circa 2020) - CIS v8 – Center for Internet Security Critical Security Controls for Effective Cyber Defense - SANS Institute / Council on Cyber Security (CCS) – (circa 2021) - IEC 62443 – ISAC - International Society of Automation Cybersecurity Standard (circa 2009-2020) - NERC CIP v5 - North American Electric Reliability Corp - Critical

		Infrastructure Protection (circa 2013-2014) - ISO/IEC 27001 – International Organization for Standardization / International Electrotechnical Commission (circa 2017-2019)
Slide 12		**KEY POINTS** Today we will focus on one specific playbook published by CISA that has a strong focus on cybersecurity events. **CISA**: **Cybersecurity Incident and Vulnerability Response Playbook** https://www.cisa.gov/cyber-incident-response
Slide 13		**KEY POINTS** **CISA**: **Cybersecurity Incident and Vulnerability Response Playbook** **Preparation** Detection & Analysis Containment Eradication & Recovery **Post-Incident Activity** **Coordination** https://www.cisa.gov/cyber-incident-response

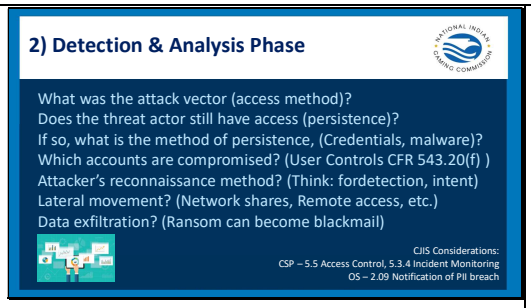
Slide 14		**KEY POINTS** •Documenting and understanding policies and procedures for incident response •Instrumenting the environment to detect suspicious and malicious activity •Establishing staffing plans •Educating users on cyber threats and notification procedures •Leveraging cyber threat intelligence (CTI) to proactively identify potential malicious activity

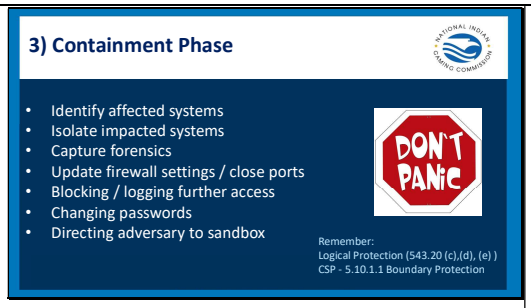
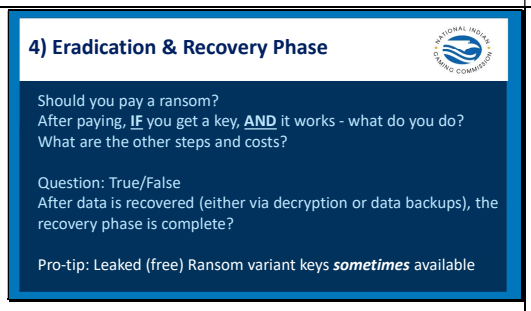
Slide 15		**KEY POINTS** **•Documenting and understanding policies and procedures for incident response** **•Instrumenting the environment to detect suspicious and malicious activity** •Establishing staffing plans •Educating users on cyber threats and notification procedures •Leveraging cyber threat intelligence (CTI) to proactively identify potential malicious activity **Keywords:** **AV (**Anti-virus**)** –- Looks for certain processes on a device **IDS (**Intrusion Detection Systems**)** –- Looks for certain activity on a network **EDR (**Endpoint Protection Response**)** –- Looks for certain activity on a device **SOC (**Security Operation Center**)** --: SOC =/ SOC2
Slide 16		**KEY POINTS** •Documenting and understanding policies and procedures for incident response •Instrumenting the environment to detect suspicious and malicious activity •Establishing staffing plans •Educating users on cyber threats and notification procedures •Leveraging cyber threat intelligence (CTI) to proactively identify potential malicious activity

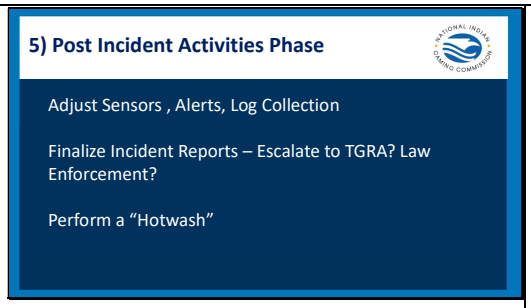
Slide 17		**KEY POINTS** •Documenting and understanding policies and procedures for incident response •Instrumenting the environment to detect suspicious and malicious activity •Establishing staffing plans •Educating users on cyber threats and notification procedures •Leveraging cyber threat intelligence (CTI) to proactively identify potential malicious activity
Slide 18		**KEY POINTS** •Documenting and understanding policies and procedures for incident response •Instrumenting the environment to detect suspicious and malicious activity **•Establishing staffing plans** **•Educating users on cyber threats and notification procedures** •Leveraging cyber threat intelligence (CTI) to proactively identify potential malicious activity

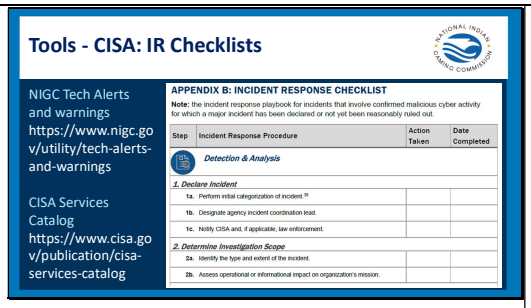
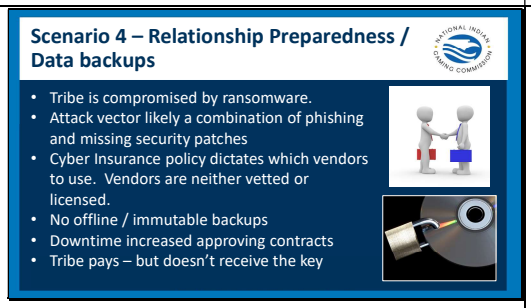
Slide 19		**KEY POINTS** •Documenting and understanding policies and procedures for incident response •Instrumenting the environment to detect suspicious and malicious activity **•Establishing staffing plans** **•Educating users on cyber threats and notification procedures** •Leveraging cyber threat intelligence (CTI) to proactively identify potential malicious activity
Slide 20		**KEY POINTS** • What is an incident? • Do you report unsuccessful attacks? • What info goes into a report? (More on next slide) • How soon? (Think 543.20(i)2) • Who do you report to? Internally, externally • Local and cross-agency communication www.ic3.gov -> Automatically goes to CISA and FBI

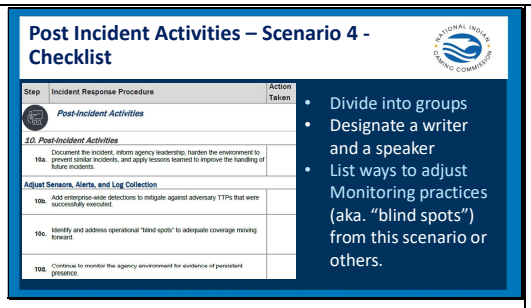
		https://www.secretservice.gov/sites/default/files/reports/2020-12/Preparing%20for%20a%20Cyber%20Incident%20-%20Contacting%20Law%20Enforcement%20v%201.0.pdf
Slide 21		**KEY POINTS:** **Know before whom to contact!** www.ic3.gov More detailed lists available online: https://www.secretservice.gov/investigation/Preparing-for-a-Cyber-Incident Logs, drive images, timeline, network topology, emails, URLs, contacted parties, etc.

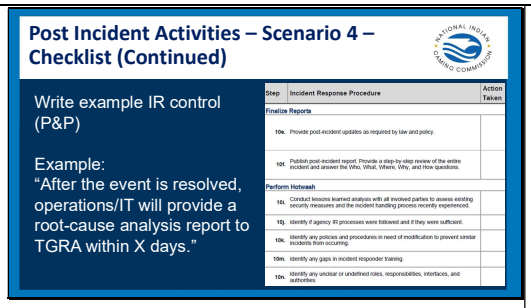
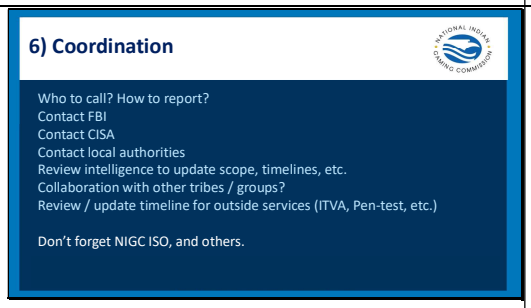
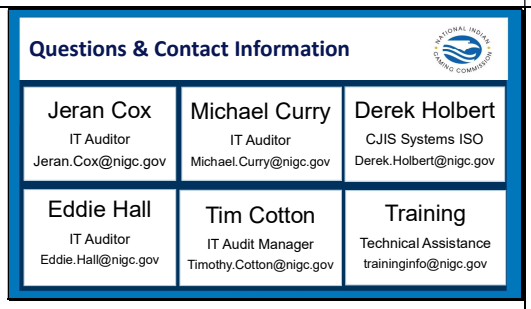
Slide 22		**KEY questions to answer** •What was the initial attack vector? (i.e., How did the adversary gain initial access to the network?) •How is the adversary accessing the environment? •Is the adversary exploiting vulnerabilities to achieve access or privilege? •How is the adversary maintaining command and control? •Does the actor have persistence on the network or device? •What is the method of persistence (e.g., malware backdoor, webshell, legitimate credentials, remote tools, etc.)? •What accounts have been compromised and what privilege level (e.g., domain admin, local admin, user account, etc.)? •What method is being used for reconnaissance? (Discovering the reconnaissance method may provide an opportunity fordetection and to determine possible intent.) •Is lateral movement suspected or known? How is lateral movement conducted (e.g., RDP, network shares, malware, etc.)? •Has data been exfiltrated and, if so, what kind and via what mechanism?

Slide 23		**KEY POINTS** •Any additional adverse impacts to mission operations, availability of services (e.g., network connectivity, services provided to external parties), • Duration of the containment process, resources needed, and effectiveness (e.g., full vs. partial containment; full vs. unknown level of containment), and • Any impact on the collection, preservation, securing, and documentation of evidence.
Slide 24		**KEY POINTS** Preparation Detection & Analysis Containment **Eradication & Recovery** Post-Incident Activity Coordination

Slide 25		**KEY POINTS** Not as important as Preparation phase, but knowing what to do after an incident is complete is also important. •Adjust Sensors, Alerts, and Log Collection (IDS, EDR, Log review/retention/protection policies) •Finalize Reports •Perform Hotwash -Ensuring root-cause has been eliminated or mitigated. > Identifying infrastructure problems to address. > Identifying organizational policy and procedural problems to address. > Reviewing and updating roles, responsibilities, interfaces, and authority to ensure clarity. > Identifying technical or operational training needs. > Improving tools required to perform protection, detection, analysis, or response actions.

Slide 26		**KEY POINTS** Where to start writing my Policies and Procedures? Many Tools and Resources: NIGC Tech Alerts and warnings https://www.nigc.gov/utility/tech-alerts-and-warnings CISA Services Catalog https://www.cisa.gov/publication/cisa-services-catalog
Slide 27		**KEY POINTS** - Reliant on cyber insurer for all aspects of resolving issue - Everything lost. No offline backups. - When you pay you may not get the key - Even if you pay….you still have to rebuild everything. - Disaster recovery plan missing, relationships and actions not predetermined. - Incident monitoring and reporting - 543.20(i)(1)

Slide 28		**KEY POINTS** **•Adjust Sensors, Alerts, and Log Collection** •Finalize Reports •Perform Hotwash -Ensuring root-cause has been eliminated or mitigated. > **Identifying infrastructure problems to address.** > Identifying organizational policy and procedural problems to address. > Reviewing and updating roles, responsibilities, interfaces, and authority to ensure clarity. > Identifying technical or operational training needs. > Improving tools required to perform protection, detection, analysis, or response actions. TTP = Tactics, techniques, Procedures (aka. P&P) Discuss and list possible monitoring blind spots from this scenario or others.

Slide 29		**KEY POINTS** Each team will write a sample control aligning with an item on the CISA checklist regarding the Post Incident Activities for a hypothetical cyber scenario.
Slide 30		**KEY POINTS** Inform and Update NIGC / CISA / FBI Review provided intelligence Update scope, timelines, etc. CISA and FBI determine escalation CISA, NIGC and others can assist with validation of received agency and 3rd party vender reports
Slide 31		**KEY POINTS** If you would like more information or would like to request this training in person, please go to www.nigc.gov and hit the "Request Training" link.

NIGC National Training Conference Evaluation

Course Name: Cybersecurity Incident Response Plans

NIGC greatly appreciates your feedback to aid in our Training offerings.

When filling out the evaluation, please use the ranking scale of 1-5 as noted.	***1 Extremely Dissatisfied***	***2 Dissatisfied***	***3 Neutral***	***4 Satisfied***	***5 Extremely Satisfied***
Did the training meet your expectations?					
Presentation materials were useful/effective. (i.e., PowerPoint, videos, handouts, etc.)					
Presentations and materials are clear.					
Overall I would rate the presentations:					
Was the presenter(s) knowledgeable in the subject matter?					
Overall, I would rate the presenter(s):					

Please provide additional details relevant to your scores above.

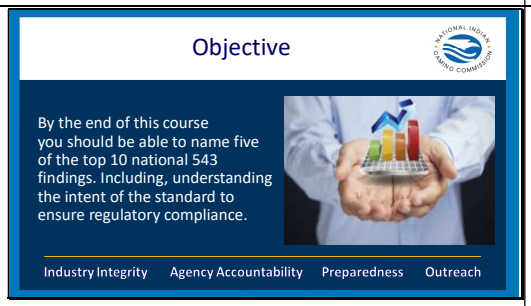
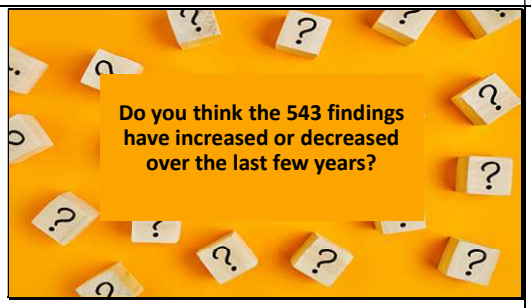
How do you feel NIGC can improve for future trainings?

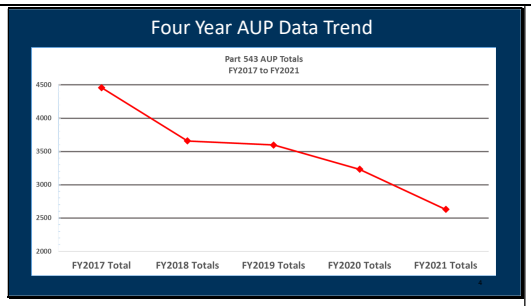
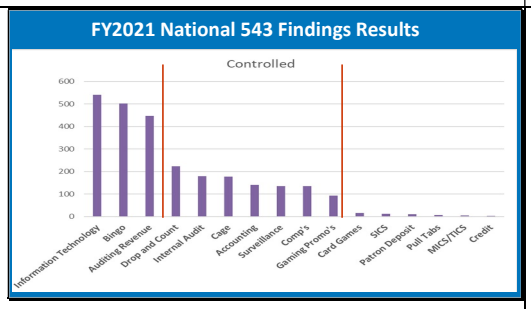
Please list any recommendations for future training topics.

Note Pages

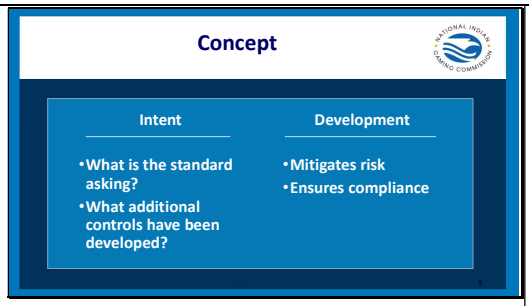
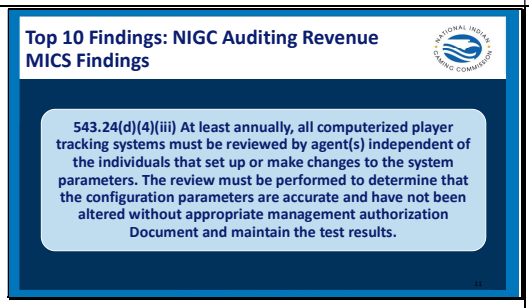
Top 10 Audit Findings Participant Guide

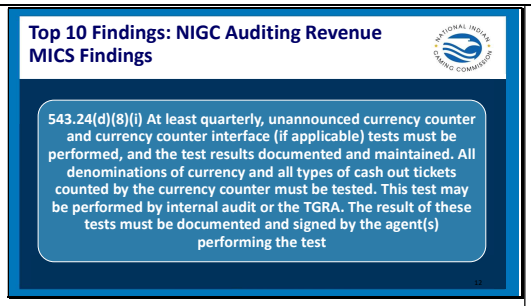
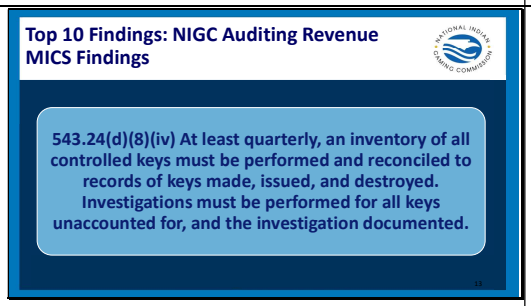
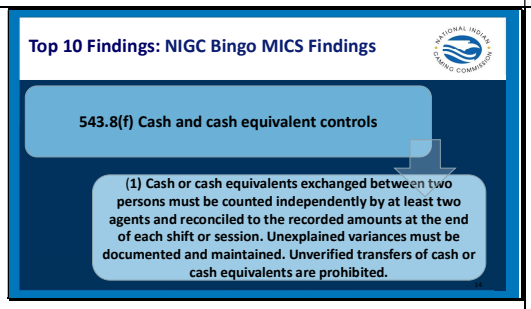
Top 10 Audit Findings Participant Guide

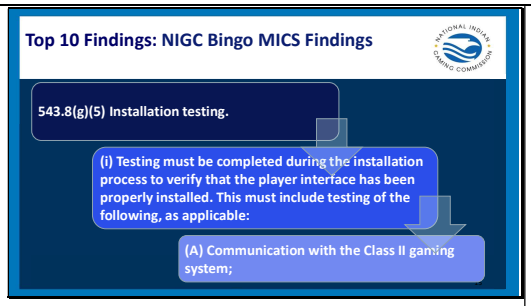
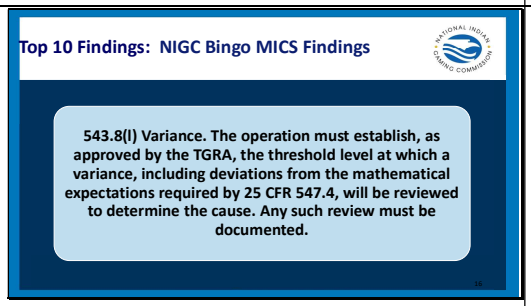
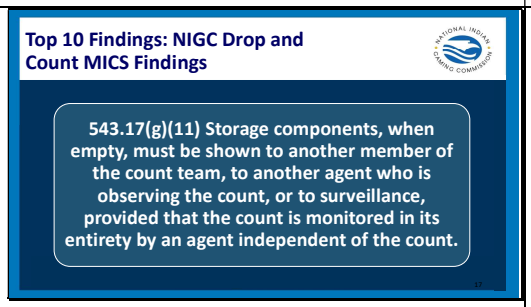
Slide 1		**Key Points** Welcome to Top 10 Audit Findings.
Slide 2		**Key Points** • Understanding the common exceptions. • Determine the Intent of the standard. • Once Intent is determined, establish the control to ensure regulatory compliance.
Slide 3		

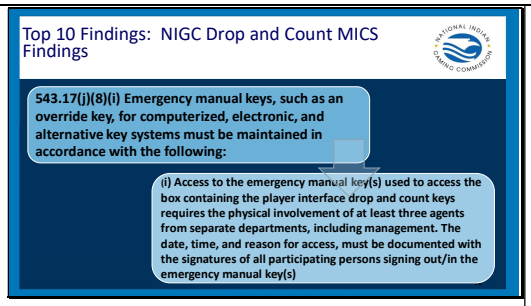
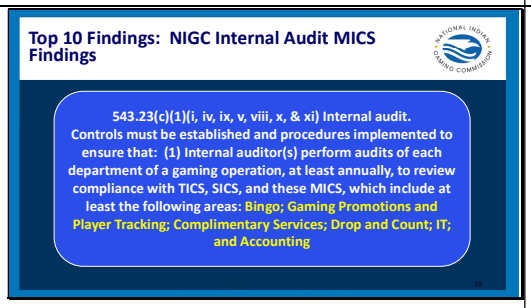
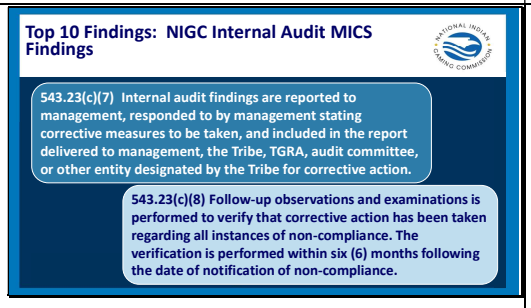
Slide 4		**Key Points** This line graph provides a better look at the decrease from FY 2017 to 2021 based on AUP data.
Slide 5		
Slide 6		**Key Points** • This chart shows the areas with the top national findings for all regions. It is listed in descending order by the number of 543 findings noted in 2021. • Because of this data, we have been providing trainings for Auditing Revenue, Bingo, and Internal Audit over the last few years. We hope our efforts in providing those specific trainings help reduce the number of findings and the operations

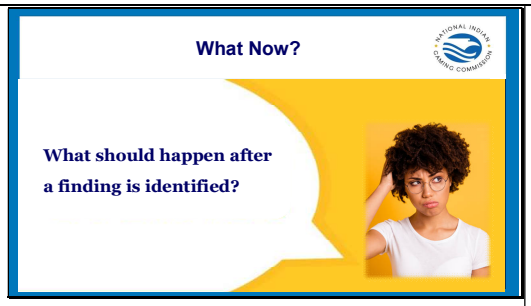
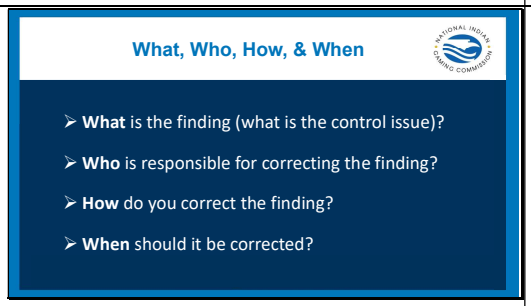
		reach compliance with those standards.
Slide 7	**AUP Data for 2021** Section / Oklahoma City / Phoenix / Portland / Rapid City / Sacramento / St. Paul / Tulsa / Washington DC / Grand Total Information Technology / 122 / 4 / 65 / 38 / 93 / 84 / 66 / 69 / 541 Bingo / 72 / 22 / 54 / 42 / 147 / 45 / 50 / 71 / 503 Auditing Revenue / 112 / 27 / 67 / 34 / 64 / 80 / 32 / 32 / 448 Drop and Count / 55 / 4 / 19 / 29 / 46 / 33 / 17 / 21 / 224 Internal Audit / 20 / 21 / 19 / 36 / 6 / 47 / 2 / 28 / 179 Cage / 42 / 9 / 19 / 14 / 35 / 16 / 19 / 23 / 177 Accounting / 38 / 13 / 33 / 32 / 5 / 12 / 3 / 5 / 141 Surveillance / 28 / 2 / 18 / 34 / 12 / 32 / 3 / 7 / 136 Comp's / 27 / 3 / 14 / 1 / 44 / 28 / 3 / 15 / 135 Gaming Promo's / 7 / / 6 / 17 / 16 / 11 / 33 / 3 / 93	**Key Points** This information breaks down the FY2021 AUP data by section and region. The section with the most AUP findings for the region for FY2021 is in red text.
Slide 8	Area / Total AUP findings Information Technology / 541 Bingo / 503 Auditing Revenue / 448 Drop and Count / 224 Internal Audit / 179 Cage / 177 Accounting / 141 Surveillance / 136 Comps / 135 Gaming Promos / 93	**Key Points** How do we come up with the data? The NIGC Audit Group compiles yearly Gross Gaming Revenues from submitted annual audited financial statements, performs analysis of the financial statements and Agreed Upon Procedures (AUP) reports for assessment of technical assistance, all to ensure regulatory compliance, gaming integrity and that tribes are the primary beneficiaries of their gaming revenues.

Slide 9		**Key Points** Controls can basically have three functions: ▪ Prevent something undesired from happening ▪ Detect when something undesired happened ▪ Corrective Action that should be taken in the event that something undesired happened Standards should be written in a way that help ensure the intent is met.
Slide 10		**Key Points** A top finding for Auditing Revenue is NIGC MICS 543.24(d)(4)(ii)(C) Gaming promotions and player tracking.
Slide 11		**Key Points** Another top finding for Revenue Audit is NIGC MICS 543.24(d)(4)(iii).

Slide 12		**Key Points** This is a top and recurring finding for Revenue Audit NIGC MICS 543.24(d)(8)(i).
Slide 13		**Key Points** Another top and common finding for Revenue Audit is NIGC MICS 543.24(d)(8)(iv)
Slide 14		**Key Points** Bingo has some common and top findings included in our list. Here is one of the top bingo findings: NIGC MICS 543.8(f) Cash and cash equivalent controls.

Slide 15		**Key Points** Another top finding for Bingo is NIGC MICS 543.8(g)(5) Installation testing.
Slide 16		**Key Points** This standard continues year after year to be a recurring finding for Bingo: NIGC MICS 543.8(l) Variance.
Slide 17		**Key Points** Let's look at Drop and Count Top Findings by starting with NIGC MICS 543.17(g)(11)

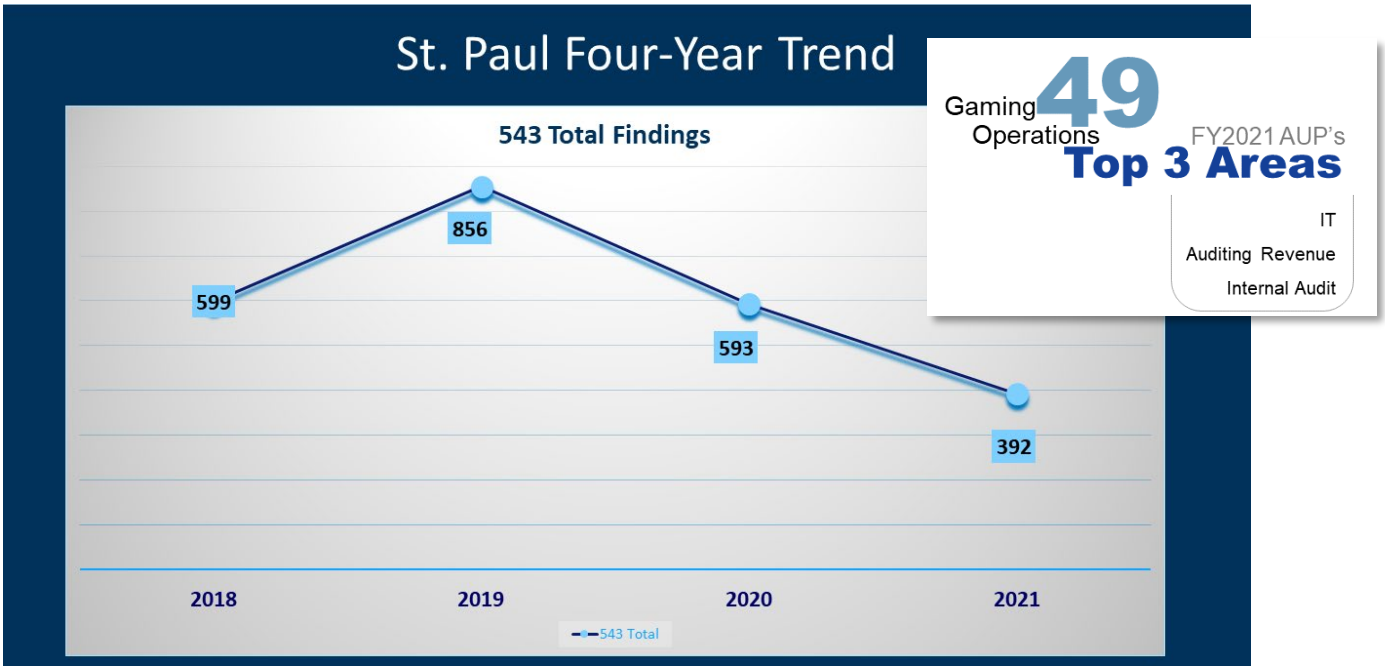
Slide 18		**Key Points** This is a recurring top finding for the Drop and Count area: NIGC MICS 543.17(j)(8)(i)
Slide 19		**Key Points** Internal Audits are critical to provide assurance of an organizations risk management, compliance, and internal control effectiveness. This area is a top finding as it is critical for an organization to have in place to determine the overall effectiveness.
Slide 20		**Key Points** This part of 543.23 (c) is a common recurring finding for Internal Audit.

Slide 21		**Key Points** What should happen after a finding is identified?
Slide 22		**Key Points** **What** – what is the finding **Who** – who is responsible **How** – who will it be corrected **When** – when should it be completed
Slide 23		**Key Points** Understanding the cause of the finding will always help address the issue and help with writing the corrective action plan.

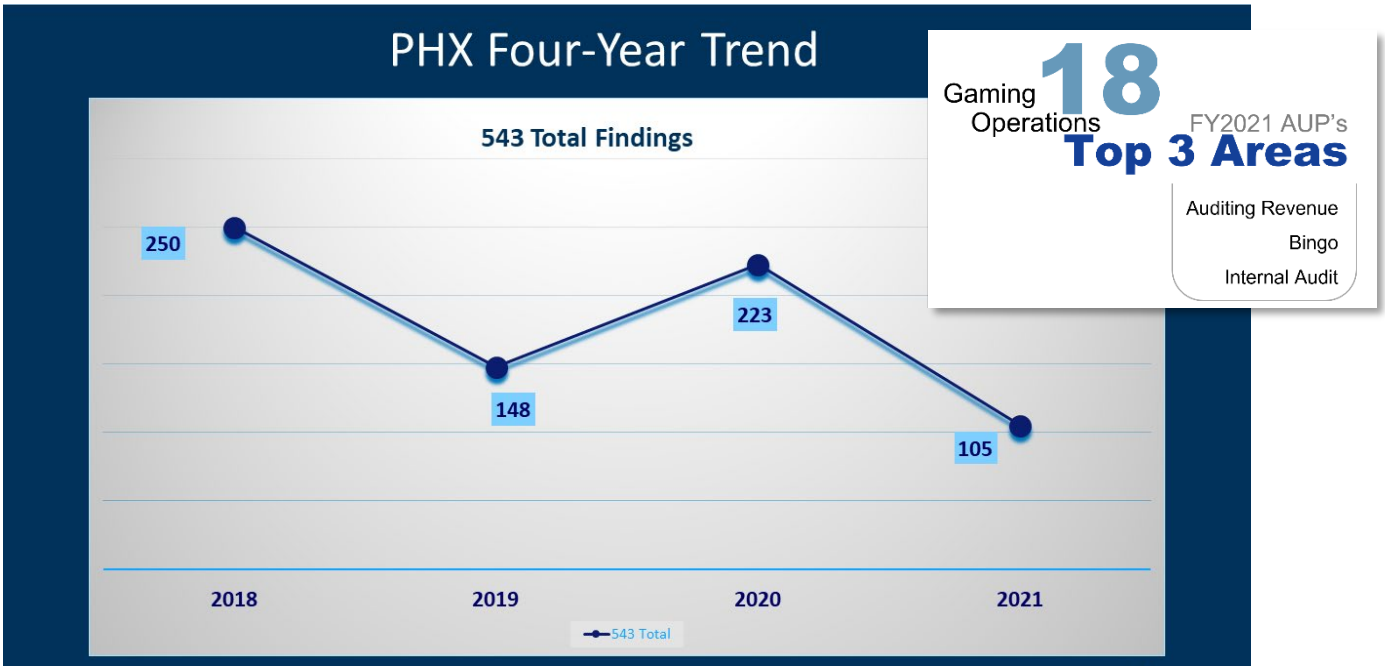
Slide 24		**Key Points** Thank you for attending. If you have any questions or comments please send them to TRAININGINFO@nigc.gov

Top 10 Audit Findings - HANDOUT #1

The following graphs show the regions' trend for the last four years.

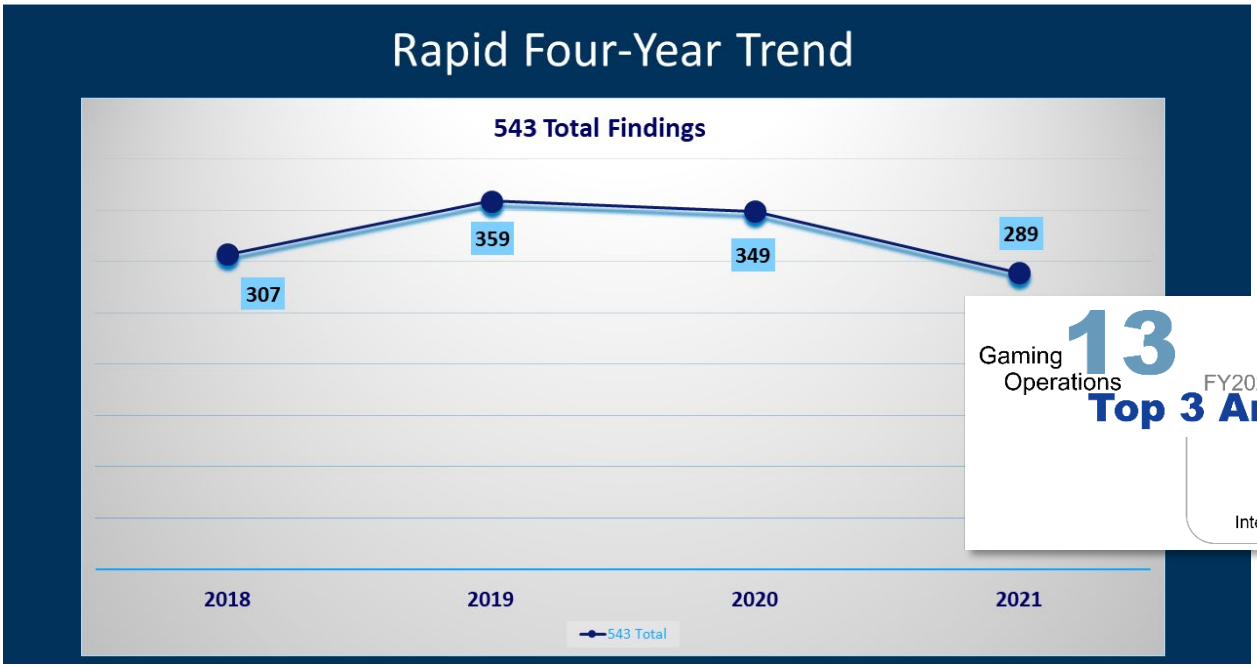


Above: There's been an overall gradual decrease from 2019 to 2021.
With a period during 2019 where the region seen it's highest number of findings.

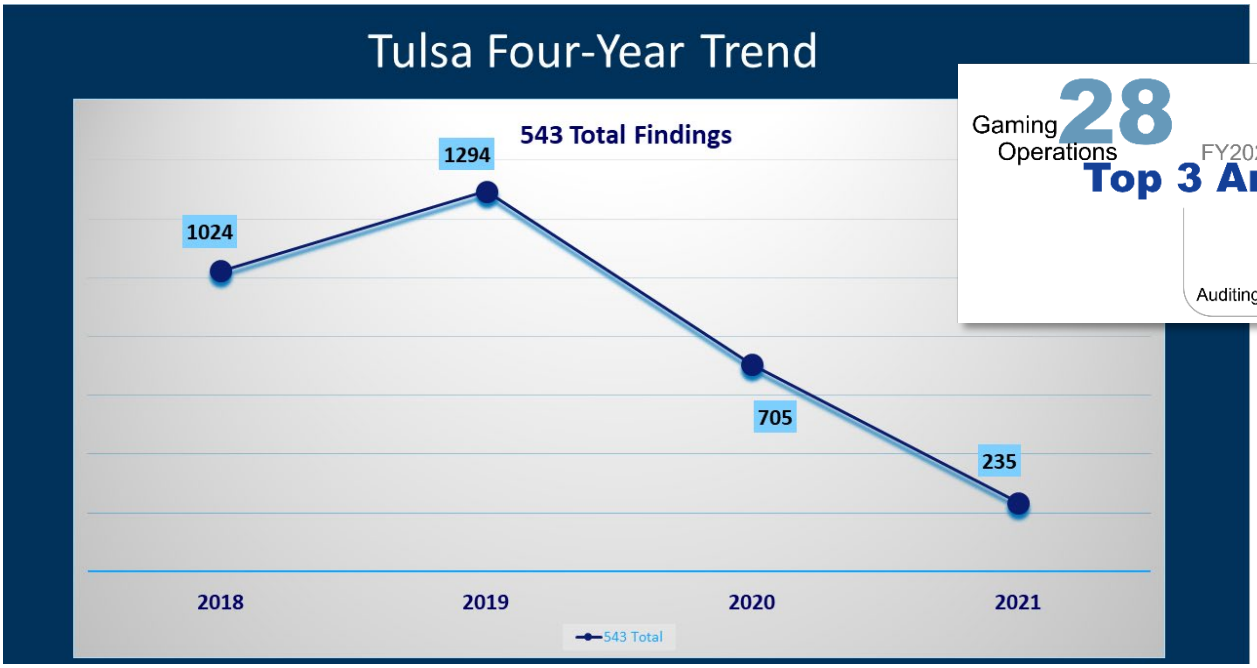


Above: There's been an overall gradual decrease from 2018 to 2021.
With a period during 2020 where the region seen it's highest number of findings.

Top 10 Audit Findings - HANDOUT #1

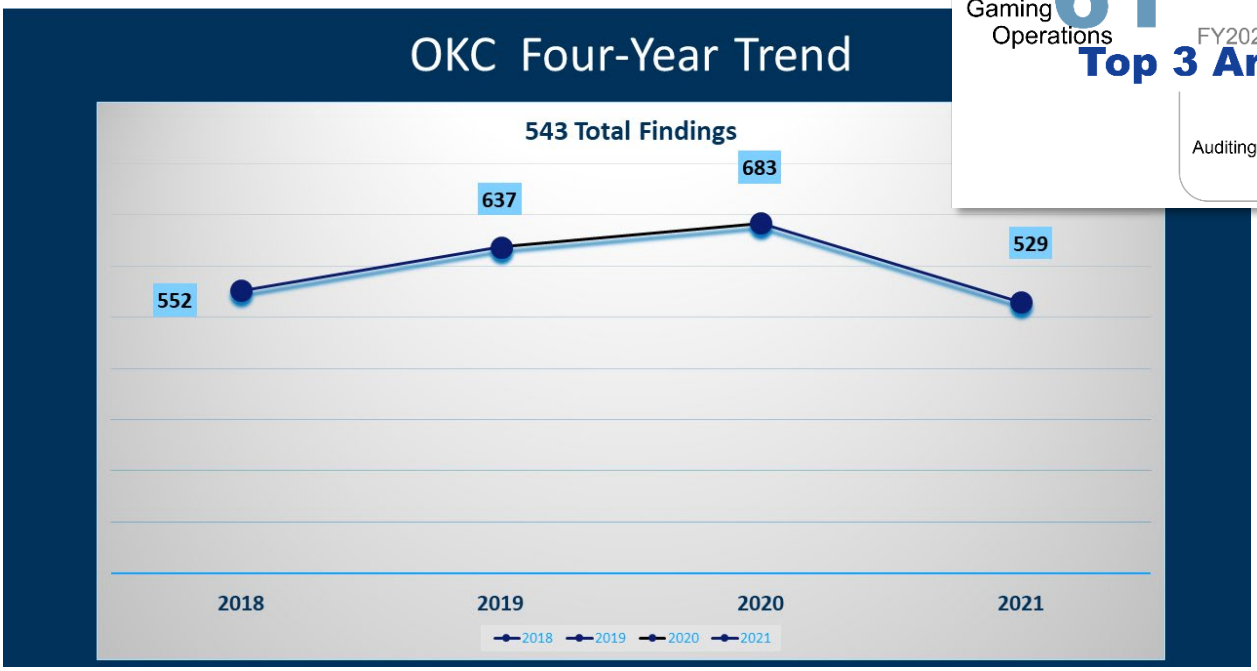


Above: The region has stayed fairly steady from 2018 to 2021.
With a period between 2019 and 2020 where the region seen it's highest number of findings.

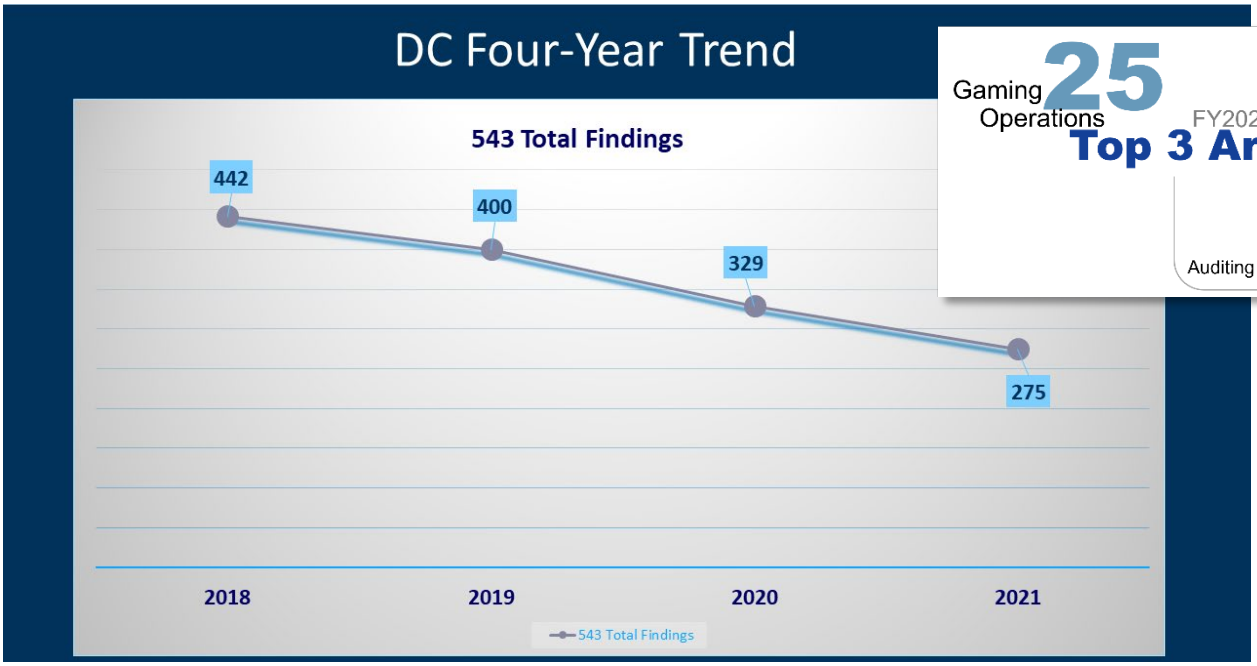


Above: There's been a large decrease from 2019 to 2021.
With a period during 2019 where the region seen it's highest number of findings.

Top 10 Audit Findings - HANDOUT #1

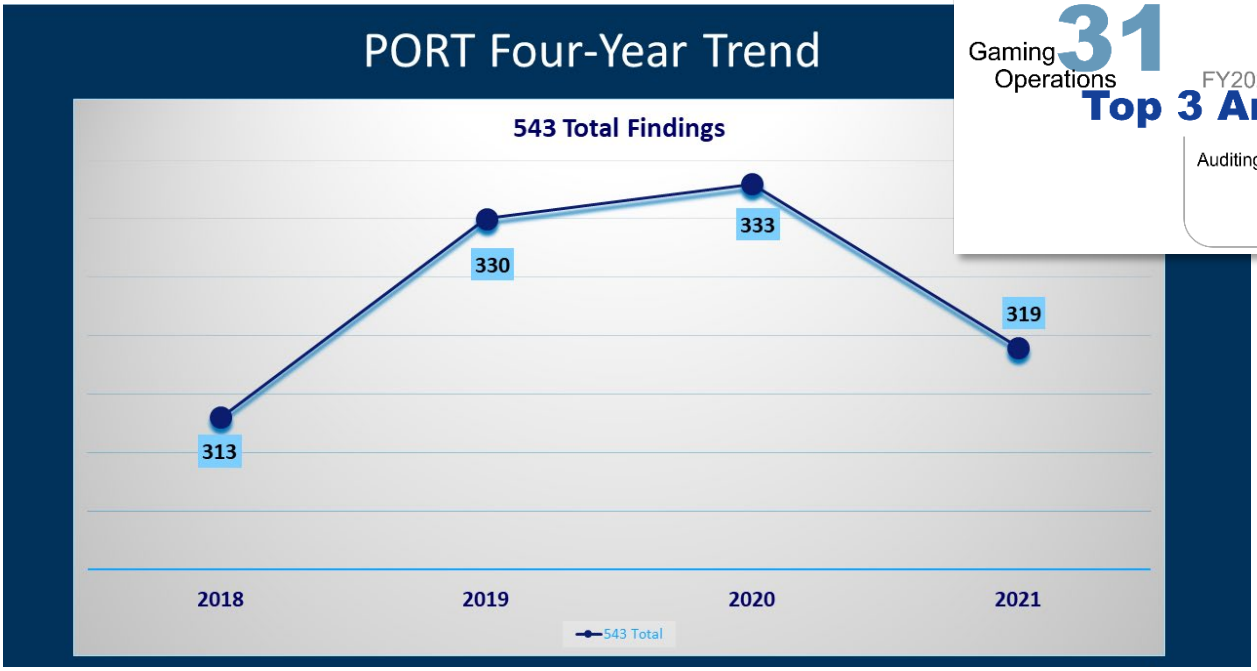


Above: There's been an overall gradual increase from 2018 to 2020.
With a period during 2020 where the region seen it's highest number of findings.

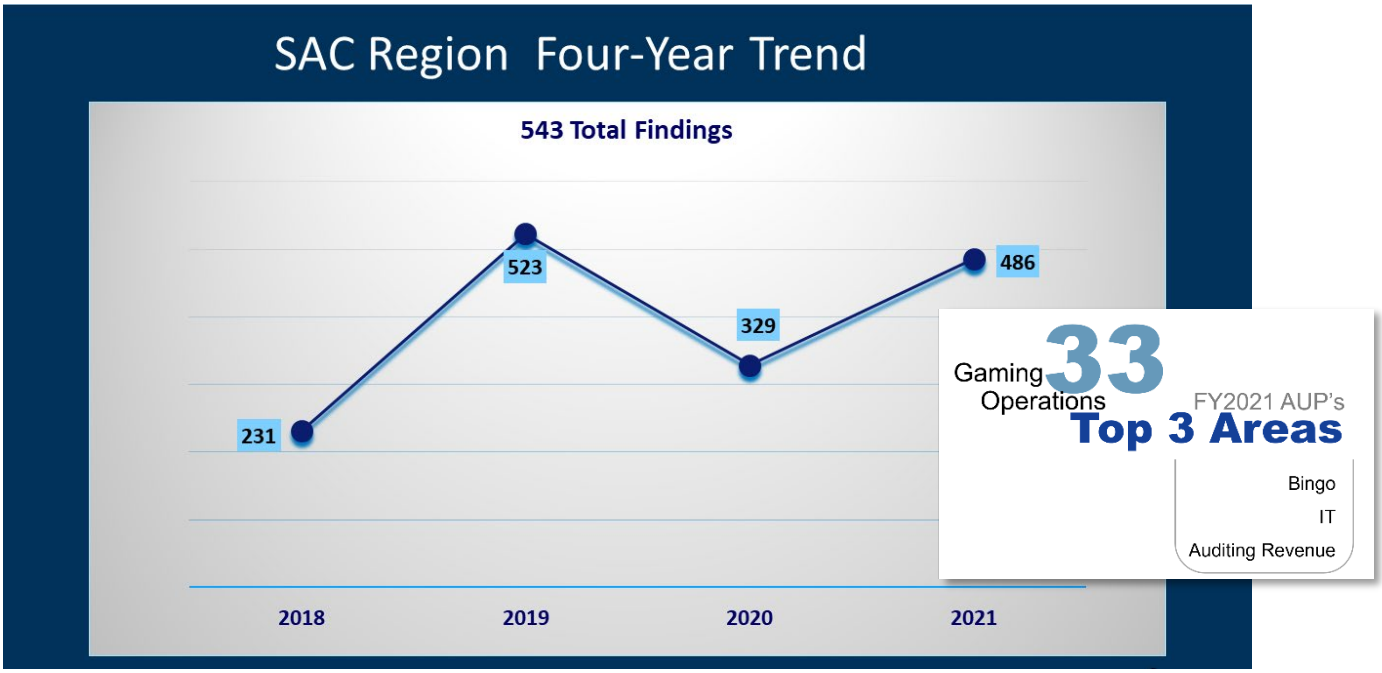


Above: There's been an overall gradual decrease from 2018 to 2021.
With a period during 2018 where the region seen it's highest number of findings.

Top 10 Audit Findings - HANDOUT #1



Above: We see a steady increase from 2018 to 2020 with a decrease in findings for 2021.



Above: There's been an overall increase from 2018 to 2021.
With a period during 2019 where the region seen it's highest number of findings.

NIGC National Training Conference Evaluation

Course Name: Top 10 Audit Findings

NIGC greatly appreciates your feedback to aid in our Training offerings.

When filling out the evaluation, please use the ranking scale of 1-5 as noted.	***1 Extremely Dissatisfied***	***2 Dissatisfied***	***3 Neutral***	***4 Satisfied***	***5 Extremely Satisfied***
Did the training meet your expectations?					
Presentation materials were useful/effective. (i.e., PowerPoint, videos, handouts, etc.)					
Presentations and materials are clear.					
Overall I would rate the presentations:					
Was the presenter(s) knowledgeable in the subject matter?					
Overall, I would rate the presenter(s):					

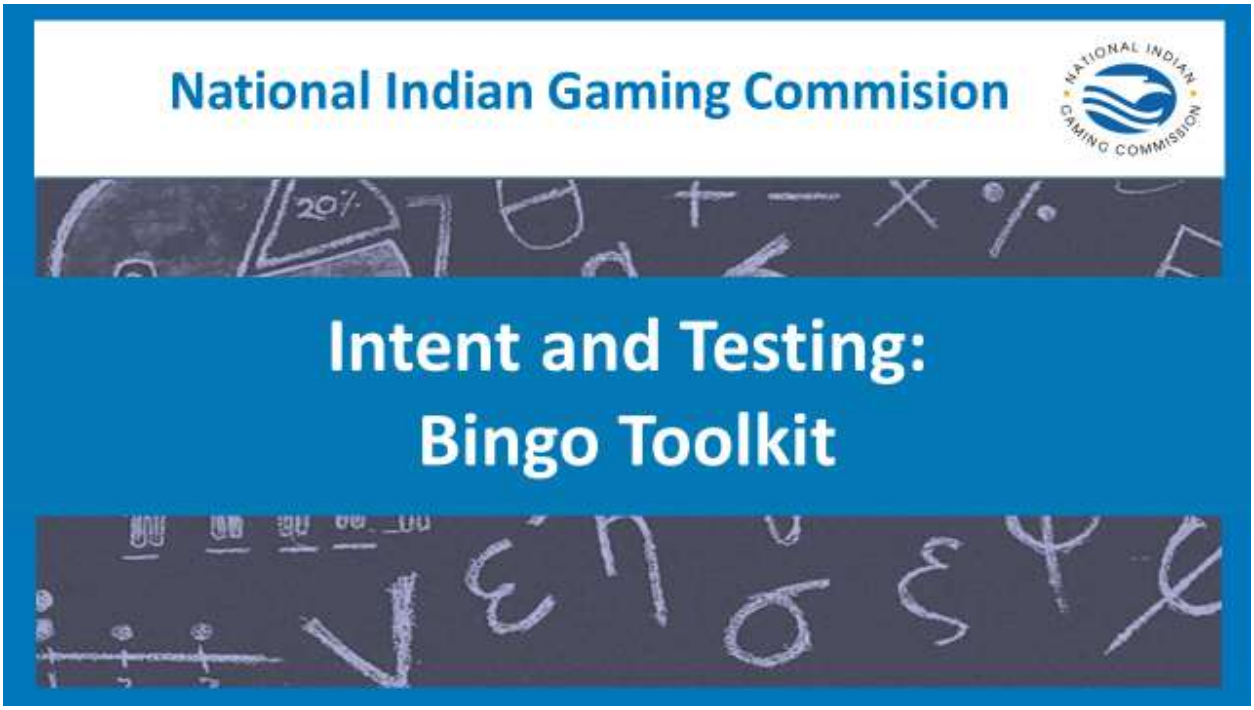
Please provide additional details relevant to your scores above.

How do you feel NIGC can improve for future trainings?

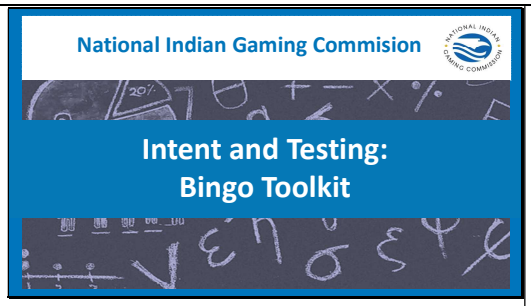
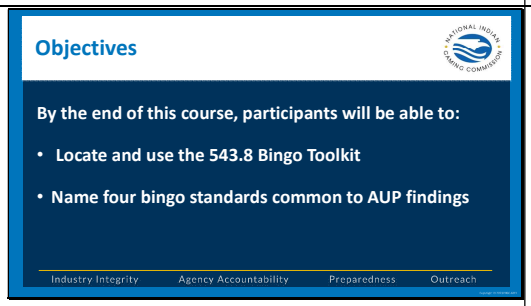
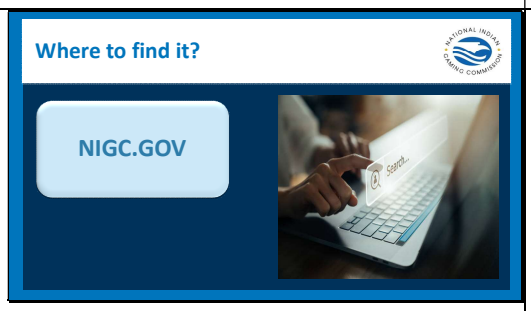
Please list any recommendations for future training topics.

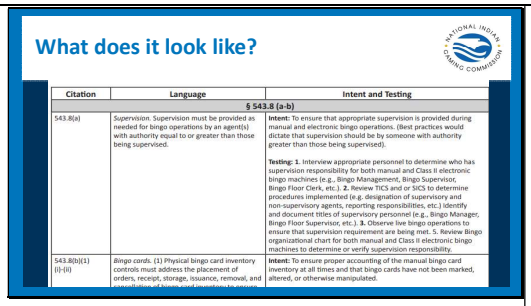
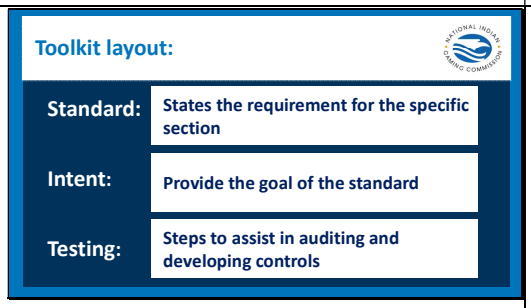
Note Pages

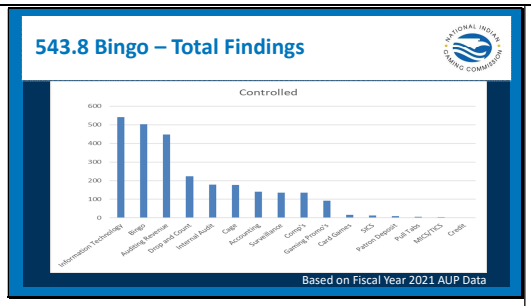
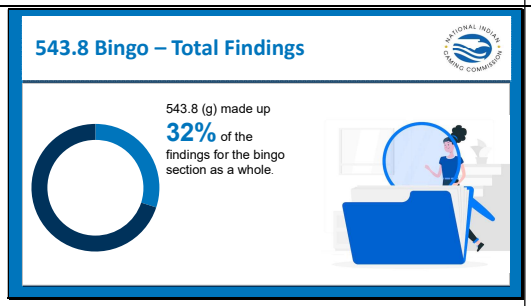
Intent and Testing: Bingo Toolkit



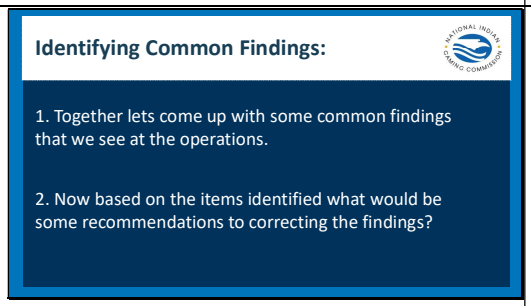
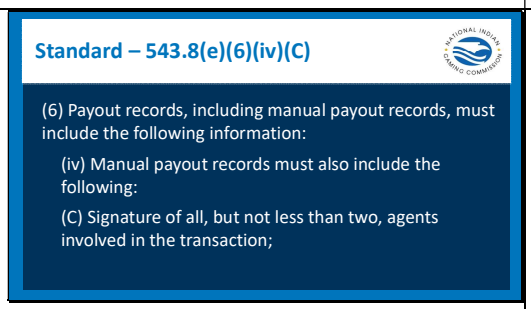
Intent and Testing: Bingo Toolkit Participant Guide

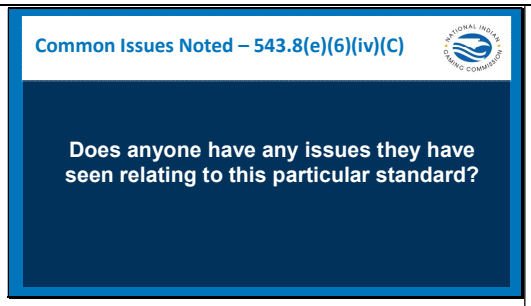
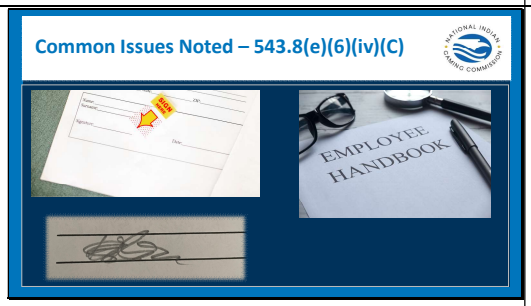
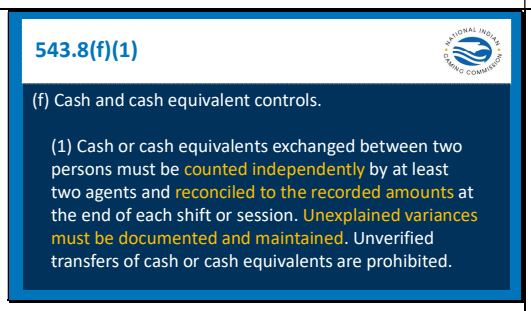
Slide 1		
Slide 2		**Key Points:** By the end of this course, participants will be able to: • Locate and use the 543.8 Bingo Toolkit • Name four bingo standards common to AUP findings
Slide 3		**Key Points:** The 543.8 Bingo Toolkit can be found on the NIGC webpage Direct link: https://www.nigc.gov/images/uploads/training/Bingo_Flipbook_Rev12_6.pdf

Slide 4		**Key Points:** • Example of a page from the Toolkit.
Slide 5		**Key Points:** The toolkit layout lists the: • Standard – the requirement as stated in Part 543 Minimum Internal Control Standards • Intent – the goal of the standard • Testing – steps listed to assist with the auditing process or with developing Tribal Internal Control Standards (TICS) or operational System of Internal Control Standards (SICS)

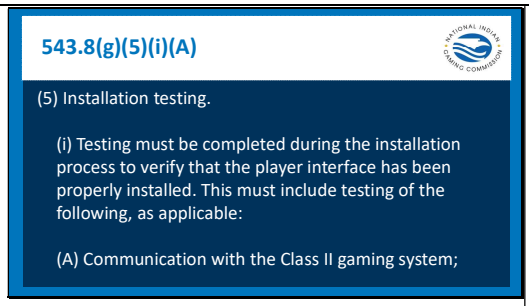
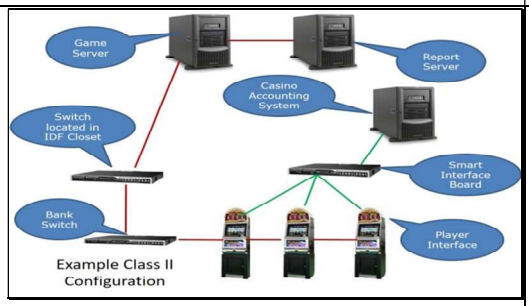
Slide 6		**Key Points:** 543.8 Bingo had 503 findings identified nationally. It is the second largest areas with the most findings. However, keep in mind bingo is one of the larger sections within the MICS. The largest section within 543.8 Bingo with the most findings was 543.8(g) Technologic aids to the play of bingo.
Slide 7		
Slide 8		**Key Points:** Find the standard 543.8(e)(5) in your Bingo Toolkit ***Common Finding 543.8(e)(5) Authorization and Signatures.*** • At least two agents must authorize, sign, and witness all manual prize payouts above $1,200, or a lower threshold as authorized by management and approved by the TGRA.

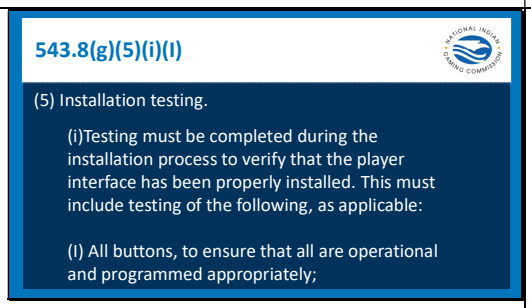
		• Manual prize payouts above the following threshold (or a lower threshold, as authorized by management and approved by TGRA) must require one of the two signatures and verifications to be a supervisory or management employee independent of the operation of Class II Gaming System bingo: (A) $5,000 for a Tier A facility; (B) $10,000 at a Tier B facility; (C) $20,000 for a Tier C facility; or (D) $50,000 for a Tier C facility with over $100,000,000 in gross gaming revenues. • The predetermined thresholds, whether set at the MICS level or lower, must be authorized by management, approved by the TGRA, documented, and maintained. • A Class II gaming system may substitute for one authorization/signature verifying, validating or authorizing a winning card, but may not substitute for a supervisory or management authorization/signature.

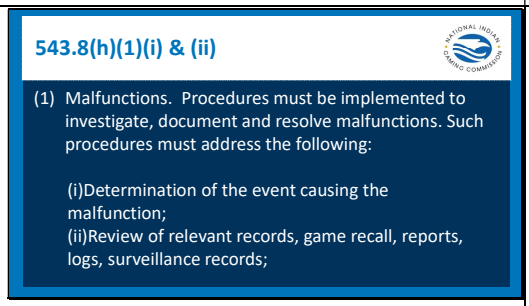
Slide 9		**Key Points:** Activity #1 Identifying Common Findings 1. Together let's come up with some common findings that we see at the operations. 2. Now based on the items identified what would be some recommendations to correcting the findings?
Slide 10		**Key Points:** ***543.8(e)(6)(iv)(C) Authorization and Signatures*** (6) Payout records, including manual payout records, must include the following information: (iv) Manual payout records must also include the following: (C) Signature of all, but not less than two, agents involved in the transaction

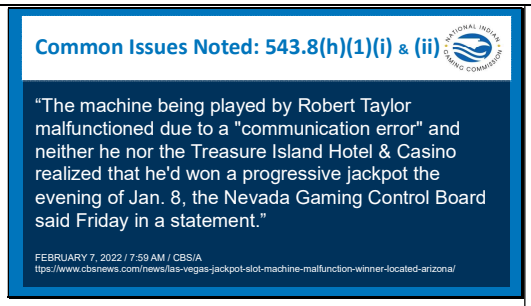
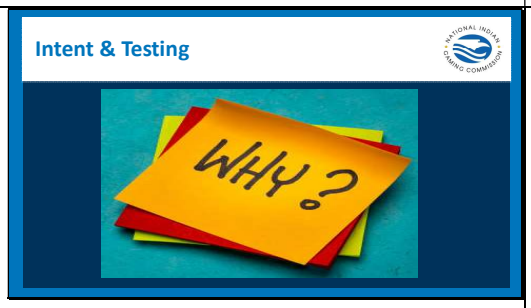
Slide 11		**Key Points:** ***543.8(e)(6)(iv)(C) Authorization and Signatures*** ***(C)*** Payout records, including manual payout records, must include the following information: Signature of all, but not less than two, agents involved in the transaction;
Slide 12		**Key Points:** ***543.8(e)(6)(iv)(C) Authorization and Signatures*** ***(C)*** Payout records, including manual payout records, must include the following information: Signature of all, but not less than two, agents involved in the transaction
Slide 13		**Key Points:** 543.8 (f)(1) (f) Cash and cash equivalent controls. (1) Cash or cash equivalents exchanged between two persons must be counted independently by at least two agents and reconciled to the recorded amounts at the end of each shift or session. Unexplained variances must be documented and maintained. Unverified transfers of cash or cash equivalents are prohibited.

Slide 14		**Key Points:** 543.8 (f)(1) (f) Cash and cash equivalent controls. (1) Cash or cash equivalents exchanged between two persons must be counted independently by at least two agents and reconciled to the recorded amounts at the end of each shift or session. Unexplained variances must be documented and maintained. Unverified transfers of cash or cash equivalents are prohibited.
Slide 15		**Key Points:** Break time!

Slide 16		**Key Points:** 543.8(g)(5)(i)(A) (5) Installation testing. (i) Testing must be completed during the installation process to verify that the player interface has been properly installed. This must include testing of the following, as applicable: (A) Communication with the Class II gaming system;
Slide 17		**Key Points:** 543.8(g)(5)(i)(A) (5) Installation testing. (i) Testing must be completed during the installation process to verify that the player interface has been properly installed. This must include testing of the following, as applicable: (A) Communication with the Class II gaming system;

Slide 18		**Key Points:** **Activity #2:** As a group lets come up with the intent and testing for this standard. (No cheating please) 543.8 (5) Installation testing. (i) Testing must be completed during the installation process to verify that the player interface has been properly installed. This must include testing of the following, as applicable: (I) All buttons, to ensure that all are operational and programmed appropriately;
Slide 19		**Key Points:** 543.8(g)(5)(i)(I) (5) Installation testing. (i) Testing must be completed during the installation process to verify that the player interface has been properly installed. This must include testing of the following, as applicable: (I) All buttons, to ensure that all are operational and programmed appropriately;

Slide 20		**Key Points:** 543.8(g)(5)(i)(I) (5) Installation testing. (i) Testing must be completed during the installation process to verify that the player interface has been properly installed. This must include testing of the following, as applicable: (I) All buttons, to ensure that all are operational and programmed appropriately;
Slide 21		**Key Points:** 543.8(h)(1)(i)&(ii) (1) Malfunctions. Procedures must be implemented to investigate, document and resolve malfunctions. Such procedures must address the following: (i) Determination of the event causing the malfunction; (ii) Review of relevant records, game recall, reports, logs, surveillance records;

Slide 22		**Key Points:** 543.8(h)(1)(i)&(ii) (1) Malfunctions. Procedures must be implemented to investigate, document and resolve malfunctions. Such procedures must address the following: (i) Determination of the event causing the malfunction; (ii) Review of relevant records, game recall, reports, logs, surveillance records;
Slide 23		**Key Points:** It's important to understand the intent of a standard to be able to write a control, implement a procedure, identify errors, or test for compliance. It's important to understand how to test for compliance with the standards to ensure the safety and integrity of the gaming operation along with mitigating the risk for fraudulent activity and protection of tribal assets. Understanding intent moves you past just checking a box on a checklist to understanding why a control is important and how it protects tribal assets.

Slide 24		**Key Points:** Thank you for joining us today. If you have any questions or comments regarding the training, please send them to TRAININGINFO@nigc.gov

NIGC National Training Conference Evaluation

Course Name: Intent and Testing: Bingo Toolkit

NIGC greatly appreciates your feedback to aid in our Training offerings.

When filling out the evaluation, please use the ranking scale of 1-5 as noted.	***1 Extremely Dissatisfied***	***2 Dissatisfied***	***3 Neutral***	***4 Satisfied***	***5 Extremely Satisfied***
Did the training meet your expectations?					
Presentation materials were useful/effective. (i.e., PowerPoint, videos, handouts, etc.)					
Presentations and materials are clear.					
Overall I would rate the presentations:					
Was the presenter(s) knowledgeable in the subject matter?					
Overall, I would rate the presenter(s):					

Please provide additional details relevant to your scores above.

How do you feel NIGC can improve for future trainings?

Please list any recommendations for future training topics.

Note Pages

Panel: Roundtable Discussion with Internal Audit Professionals Participant Guide

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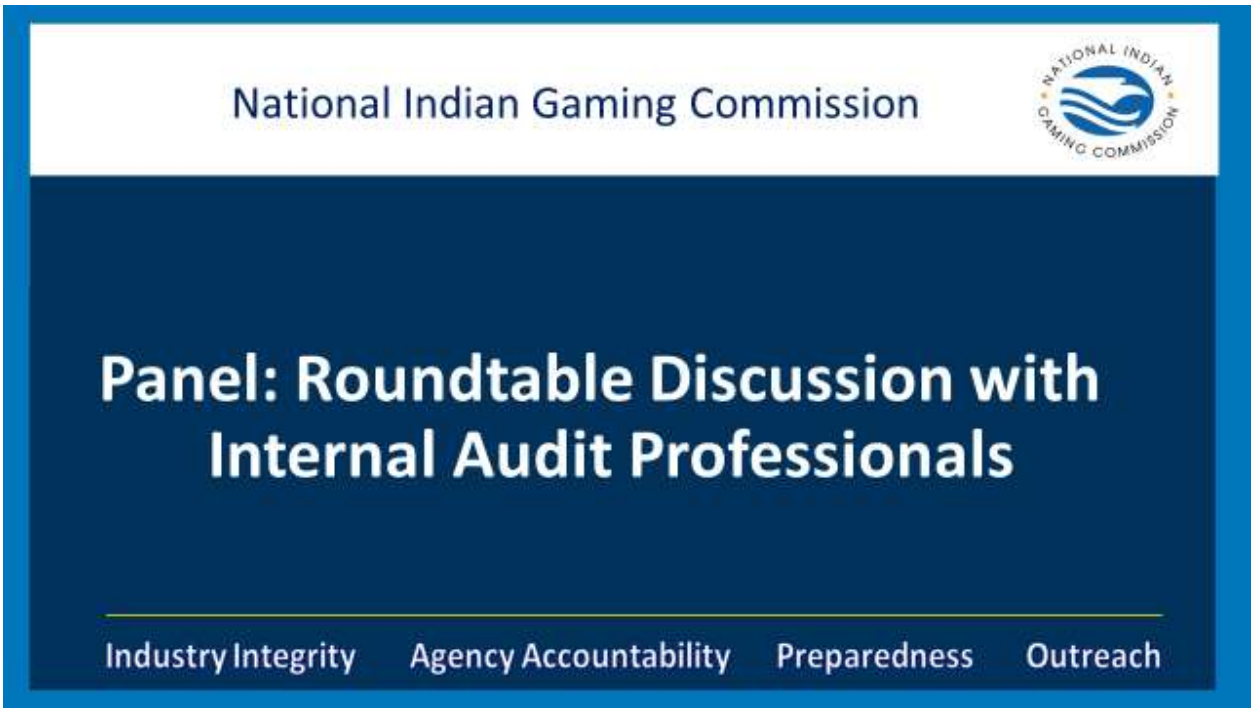

NIGC National Training Conference Evaluation

Course Name: Panel: Roundtable Discussion with Internal Audit Professionals

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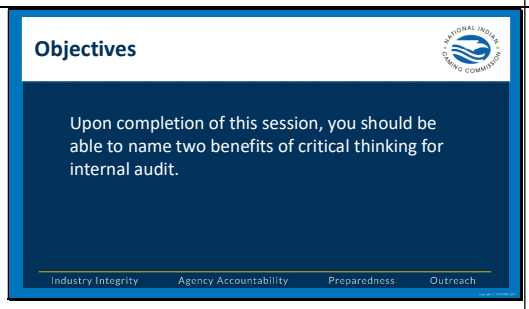
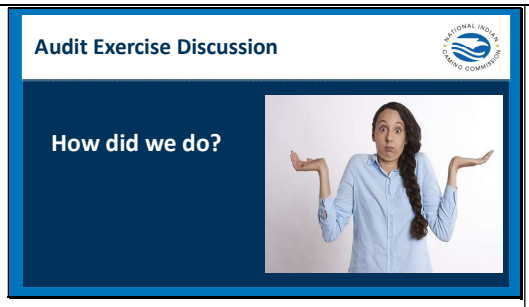
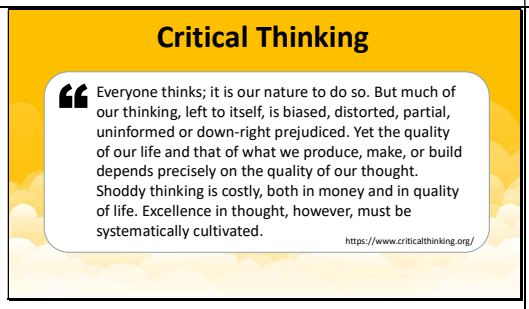
Note Pages

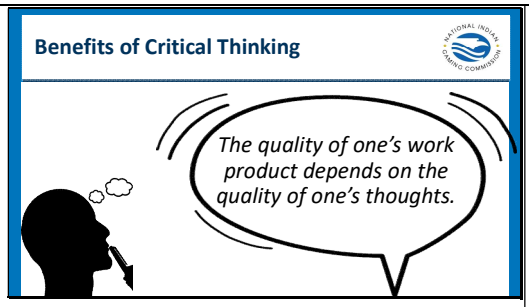
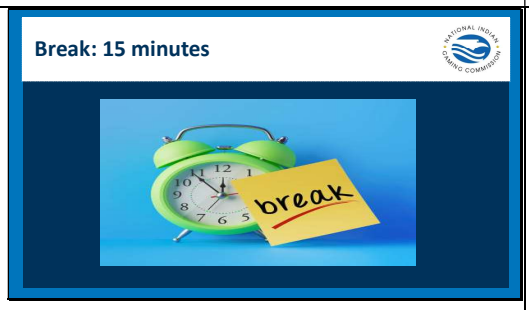
Critical Thinking: Enhancing the Internal Audit

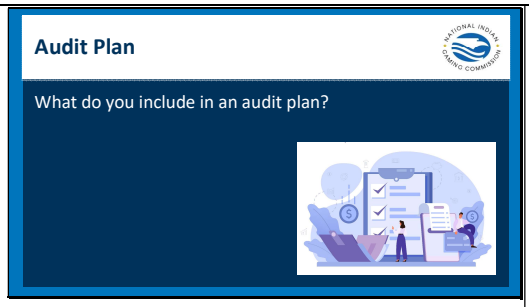
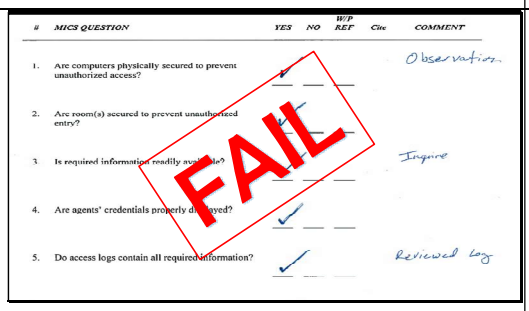
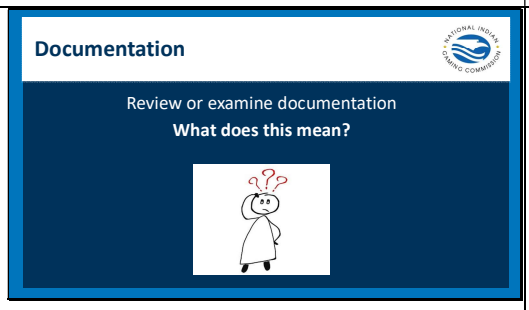
Participant Guide

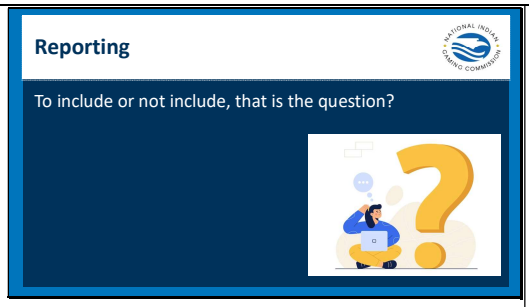
Critical Thinking: Enhancing the Internal Audit Participant Guide

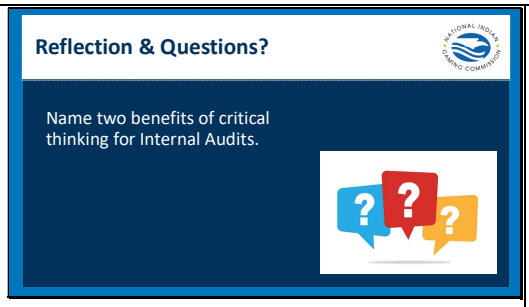
Slide 1		
Slide 2		**KEY POINTS** You should be able to name two benefits of critical thinking for internal audit.
Slide 3		**KEY POINTS** **Activity (Ice Breaker)** **Supplies:** • Handout #1 Ice Breaker • Pen **Directions:** At your tables read through the standard and come up with questions or testing that you would complete to verify compliance.

Slide 4		**KEY POINTS** How did we do?
Slide 5		**KEY POINTS** Everyone thinks; it is our nature to do so. However, much of our thinking, left to itself, is biased, distorted, partial, uninformed or downright prejudiced. Yet the quality of our life and that of what we produce, make, or build depends precisely on the quality of our thought. Shoddy thinking is costly, both in money and in quality of life. Excellence in thought, however, must be systematically cultivated - https://www.criticalthinking.org/

Slide 6		**KEY POINTS** Benefits of critical thinking: • It helps Internal Auditors successfully scope, assess and report on risk • Improves decision-making by Internal Auditors that can result in better organizational performance
Slide 7		**KEY POINTS** *(1) Internal auditor(s) perform audits of each department of a gaming operation, at least annually, to review compliance with TICS, SICS, and these MICS, which include at least the following areas:*
Slide 8		**KEY POINTS** Break

Slide 9		**KEY POINTS** (1) Internal auditor(s) perform audits of each department of a gaming operation, at least annually, to review compliance with TICS, SICS, and these MICS, which include at least the following areas:
Slide 10		**KEY POINTS** Fieldwork: Here is an example of a poorly completed checklist.
Slide 11		**KEY POINTS** *(4) Documentation such as checklists, programs, reports, etc. is prepared to evidence all internal audit work and follow-up performed as it relates to compliance with TICS, SICS, and these MICS, including all instances of noncompliance.*

Slide 12		**KEY POINTS** Critical thinking will help you determine what issues to include in the report.
Slide 13		**KEY POINTS** Let's practice what we have learned. **Activity – Scenario** **Supplies:** • Handout #2 • Pen **Time:15 minutes** **Instructions:** Read the scenario and answer the questions on your handout. What other actions should be done to measure risk? Why?

Slide 14		**Key Points:** Name two benefits of critical thinking for Internal Audit. 1. 2. Thank you for attending "Critical Thinking: Enhancing Internal Audit". If you have any questions or comments please send them to TRAININGINFO@nigc.gov

Critical Thinking: Enhancing the Internal Audit – Handout #1

Exercise: You, the Internal Auditor is tasked with ensuring compliance with the below internal control standard 543.24(d)(4)(iii). When completing an audit of the Revenue Audit Department. What questions and testing should you conduct to have a successful audit? Try to think of five and write your answers in the lines below.

Scenario:

543.24(d)(4)(iii) At least annually, all computerized player tracking systems must be reviewed by agent(s) independent of the individuals that set up or make changes to the system parameters. The review must be performed to determine that the configuration parameters are accurate and have not been altered without appropriate management authorization Document and maintain the test results.

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Critical Thinking: Enhancing the Internal Audit – Handout #2

RELEVENT STANDARDS:

25 CFR 543.17(j) **Controlled keys.** Controls must be established, and procedures implemented to safeguard the use, access, and security of keys in accordance with the following:

(1) Each of the following requires a separate and unique key lock or alternative secure access method:

(i) Drop cabinet;
(ii) Drop box release;
(iii) Drop box content; and
(iv) Storage racks and carts used for the drop

(2) Access to and return of keys or equivalents must be documented with the date, time, and signature or other unique identifier of the agent accessing or returning the key(s).

(i) For Tier A and B operations, at least two (2) drop team agents are required to be present to access and return keys. For Tier C operations, at least three (3) drop team agents are required to be present to access and return keys.

(ii) For Tier A and B operations, at least two (2) count team agents are required to be present at the time count room and other count keys are issued for the count. For Tier C operations, at least three (two for card game drop box keys in operations with three tables or fewer) count team agents are required to be present at the time count room and other count keys are issued for the count.

(3) Documentation of all keys, including duplicates, must be maintained, including:

(i) Unique identifier for each individual key;
(ii) Key storage location;
(iii) Number of keys made, duplicated, and destroyed; and
(iv) Authorization and access

(4) Custody of all keys involved in the drop and count must be maintained by a department independent of the count and the drop agents as well as those departments being dropped and counted.

(5) Other than the count team, no agent may have access to the drop box content keys while in possession of storage rack keys and/or release keys.

(6) Other than the count team, only agents authorized to remove drop boxes are allowed access to drop box release keys.

(7) Any use of keys at times other than the scheduled drop and count must be properly authorized and documented.

(8) Emergency manual keys, such as an override key, for computerized, electronic, and alternative key systems must be maintained in accordance with the following:

(i) Access to the emergency manual key(s) used to access the box containing the player interface drop and count keys requires the physical involvement of at least three agents from separate departments, including management. The date, time, and reason for access, must be documented with the signatures of all participating persons signing out/in the emergency manual key(s);

(ii) The custody of the emergency manual keys requires the presence of two agents from separate departments from the time of their issuance until the time of their return; and

(iii) Routine physical maintenance that requires access to the emergency manual key(s), and does not involve accessing the player interface drop and count keys, only requires the presence of two agents from separate departments. The date, time, and reason for access must be documented with the signatures of all participating agents signing out/in the emergency manual key(s).

Critical Thinking: Enhancing the Internal Audit – Handout #2

Exercise: You, the Internal Auditor, is tasked with ensuring compliance with the above internal control standards. Below is the scene.

Scenario:

You are given a monthly inventory sheet for the 3 months (Jan, April, July) along with sign out/in key logs for three days (test days). Upon your review of the documents, you determine the key inventory was completed with no issues. The sign in/out logs also indicate that keys were signed out/in according to procedure. The next day you are watching the drop and count process. You notice keys are signed out from an electronic key box in the cage. You continue to watch the drop process and conclude the key removal and replacement process is according to procedure.

Using our critical thinking skills: **What other actions should be done to measure risk? Why?**

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NIGC National Training Conference Evaluation

Course Name: Critical Thinking: Enhancing the Internal Audit

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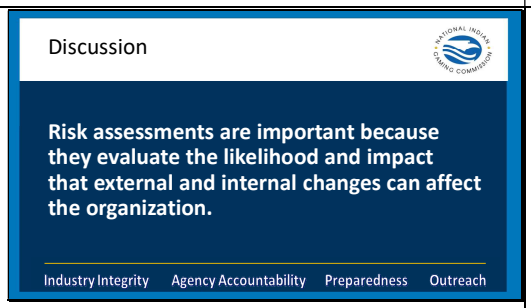
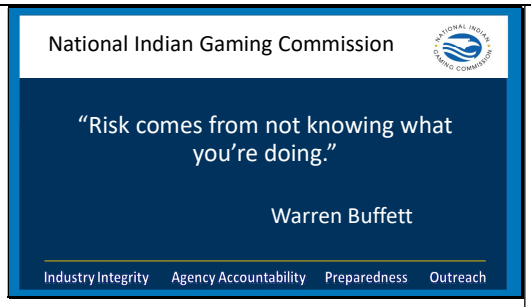
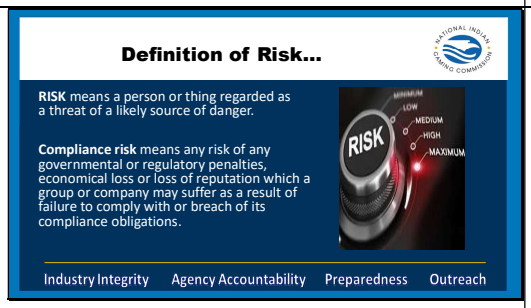
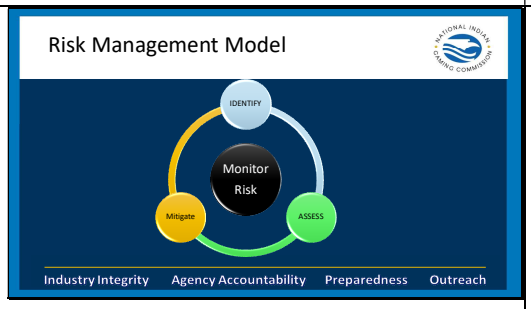
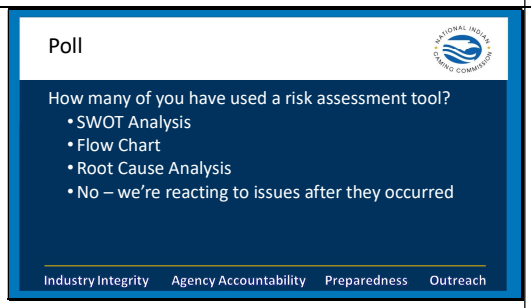
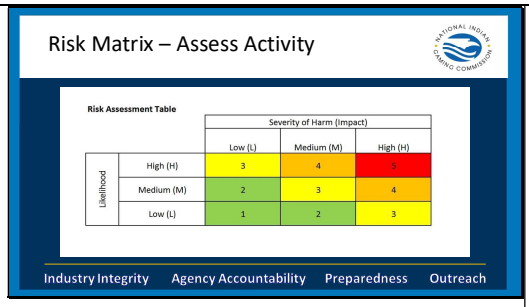
Note Pages

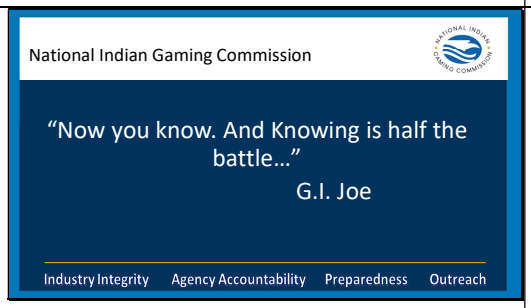
Risk Assessments Participant Guide

Slide 1		**KEY POINTS** Risk Assessments are necessary so one can understand the risk associated with a process or activity. Risk assessments can reduce the likelihood of something occurring or reoccurring.
Slide 2		
Slide 3		**KEY POINTS** Working in groups, write out risks taken to be here today.

Slide 4		
Slide 5		**KEY POINTS** What is your TGRA compliance risk? **RISK** means a person or thing regarded as a threat of a likely source of danger. There are many categories of risk involved in a casino or TGRA. Let us focus Compliance Risk. This involves the government or regulatory penalties, economical loss or loss of reputation a company may suffer because of failing to comply with a breach of compliance.
Slide 6		**KEY POINTS** Elements of the risk model include Identify, Assess, Respond to Risk, and Monitoring Risk. Make sure the right people are involved in risk discussions and the policy is clear. Create a culture around risk management and communicate risks as they arise. Continuously monitor for risks.

Slide 7		Time for an activity.
Slide 8		
Slide 9		**KEY POINTS** Your organization needs to understand… what you are good at, to understand how big a threat any risks are to your organization. Through a third party contract, you are not in 100% control of the third party, there would be high risk, and without the knowledge, it is possible the third party may begin manage. Putting your organization at risk for IGRA Violations.

Slide 10		**KEY POINTS** A <u>risk matrix</u> is a visual representation of risks laid out in a diagram or a table, hence its alternate name as a risk diagram. Here, risks are divided and sorted based on their probability of happening and their effects or impact. A risk matrix is often used to help prioritize which risk to address first, what safety measures and risk mitigation plans to take, and how a certain task should be done. Risk matrices can come in any size and number of columns and rows, depending on the project and risks being discussed.
Slide 11		**KEY POINTS** Risk Mitigation is the practice of reducing identified risks. It is one of the four ways to treat risk: avoid, transfer, accept or mitigate. The tools or techniques you use depends on the type of risk you want to mitigate. Way to reduce include: Audits, Backups, Independence, Policies, Training, Communication, Insurance , Contingency plans, Equipment, Due Diligence and Training

Slide 12		**KEY POINTS** Will we accept it? Will we avoid it by not implementing? Will we transfer it to another party or third party? Will we reduce it enough and are happy with the controls we added?
Slide 13		
Slide 14		

Identifying Risk - Group Exercise

***Scenario*:** The TGRA receives information that the Gaming Operation plans to implement Cashless Wagering, using a third-party vendor. This is new to the gaming operation. Taking the time to understand what risks and potential threats are associated with implementing a new process is an important step in assessing risk.

***Directions*:** Discuss with those in your group and determine a list of individuals who should be involved in assessing and then brainstorm all the possible threats that exist. Select someone to document the group's results and share the responses.

Who needs to be involved in assessing the risk?

What are the risks?

Activity – Assess and Analyze Risk

Scenario: The TGRA determined the risks associated with implementing cashless wagering using a third-party vendor. The next step is to analysis your current organization. **Directions**: As a group, conduct a SWOT analysis on your gaming operation to determine risks of implementing cashless wagering, using a third-party vendor.

Aid: ***Strengths*** – what you do well: ***Weakness*** – where you need improvement: ***Opportunities*** – what changes could occur to help you: ***Threats*** – what changes could cause issues.

SWOT analysis is a framework for identifying and analyzing an organizations strengths, weakness, opportunities and threats.

Strengths	Weakness
Opportunity	**Threats**

Slide 10 and 11

Activity: Risk assessment table

		Severity of Harm (Impact)		
		Low (L)	Medium (M)	High (H)
Likelihood	High (H)			
	Medium (M)			
	Low (L)			

Directions: This stage of a risk assessment involves estimating the likely impacts of the risks your group identified in the last activity. Select one of the risks identified. Based on your assessment of the strengths and weaknesses, determine the likelihood it will occur and the severity of harm. Select someone to record the group's responses and be prepared to discuss.

1. **Risk (from previous activity): _____**

2. **Describe the likelihood this is to occur and provide your reasoning (Ex: Highly, Moderate, very unlikely):**

3. **Describe the severity of impact to the organization if it were to occur and reasoning:**

Part B: Completed when prompted: Mitigating Risk

4. **Relying on your analysis above determine how to mitigate the risk to reduce its impact. (Ex: reduce, transfer, accept)**

Ultimately, every organization must define and determine how they will rate risk. Regardless of how you have rated your risk, continuous evaluating and monitoring is necessary even with little risk to determine if risks have changed.

NIGC National Training Conference Evaluation

Course Name: Risk Assessments

NIGC greatly appreciates your feedback to aid in our Training offerings.

When filling out the evaluation, please use the ranking scale of 1-5 as noted.	***1 Extremely Dissatisfied***	***2 Dissatisfied***	***3 Neutral***	***4 Satisfied***	***5 Extremely Satisfied***
Did the training meet your expectations?					
Presentation materials were useful/effective. (i.e., PowerPoint, videos, handouts, etc.)					
Presentations and materials are clear.					
Overall I would rate the presentations:					
Was the presenter(s) knowledgeable in the subject matter?					
Overall, I would rate the presenter(s):					

Please provide additional details relevant to your scores above.

How do you feel NIGC can improve for future trainings?

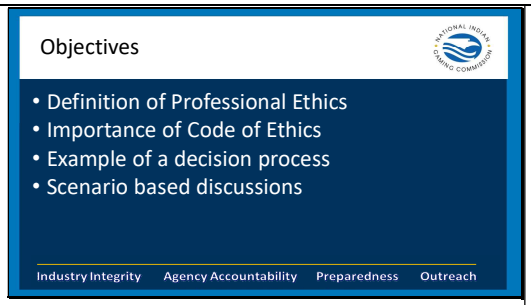
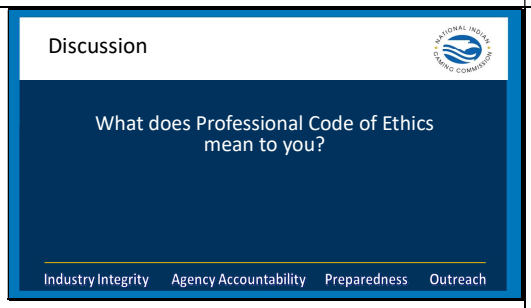
Please list any recommendations for future training topics.

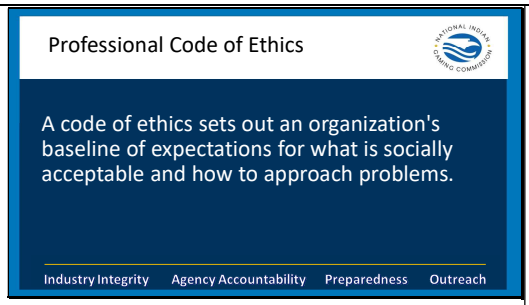
Note Pages

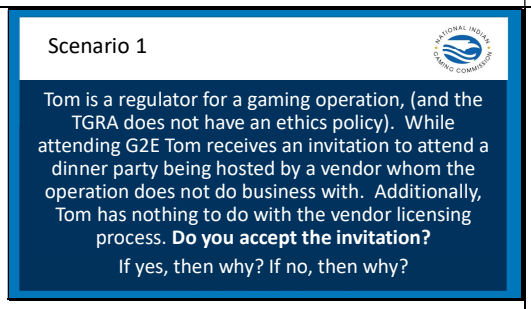
Ethical Considerations for Regulators Participant Guide

Ethical Considerations for Regulators Participant Guide

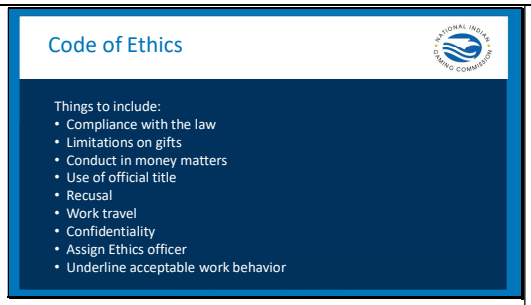
Slide 1		**Key Points:** Personal ethics refers to **the ethics that a person identifies with in respect to people and situations that they deal with in everyday life**. Professional ethics refers to the ethics that a person must adhere to in respect of their interactions and business dealings in their professional life.
Slide 2		Video

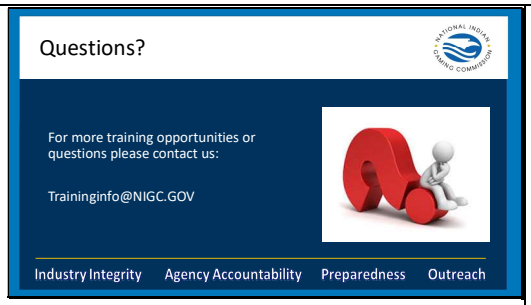
Slide 3		**Key Points:** A professional code of ethics is designed to ensure employees are behaving in a manner that is socially acceptable and respectful of one another. It establishes the rules for behavior and sends a message to every employee that universal compliance is expected. It also provides the groundwork for a preemptive warning if employees break the code. A code of ethics can be valuable not just internally as a professional guide but also externally as a statement of a company's values and commitments.
Slide 4		

Slide 5		**Key Points:** Professional ethics concerns ethical dilemmas or controversial issues faced by a company. Often, business ethics involve a system of practices and procedures that help build trust with the consumer. On one level, some business ethics are embedded in the law, such as minimum wages, insider trading restrictions, and environmental regulations. On another, business ethics can be influenced by management behavior, with wide-ranging effects across the company.
Slide 6		**Key Points:** Consequences in detail, listing both the pro's and con's; an analysis of the action, what are the potential outcomes; making a decision.

Slide 7		
Slide 8		

Slide 9	Scenario 2 Tom is a regulator, and the TGRA does not have an ethics policy. A peer invites Tom to play in a $100 paid Fantasy Football League, he says he will need a personal email address from Tom and the draft will take place when he is not on duty. **Should Tom play?** If yes, then why? If no, then why?	
Slide 10	Scenario 3 Tom is a regulator, recently Tom watched the Superbowl at his neighbor's house, who also serves at the Slot Director, of the gaming operation. During the game Tom bets $100 that his team will win. The TGRA ethics policy is clear, zero tolerance, gaming of any kind is not allowed. During the slot audit, the slot director asks Tom not to report certain findings in the audit report and promises he will correct them. Tom knows the policy is to report every finding, but the slot director may report the Superbowl bet. **What should Tom do?**	

Slide 11		**Key Points:** Code of Ethics explains your expectations as to how work should be performed. It provides a framework for how employees should interact with each other and stakeholders. It can build trust with stakeholders and improve employee retention rates. Setting priorities and asking for input for employees is important.
Slide 12		**Key Points:** Include a copy of the code of ethics in the new hire onboarding and training.

Slide 13	 Questions? For more training opportunities or questions please contact us: Traininginfo@NIGC.GOV Industry Integrity Agency Accountability Preparedness Outreach	

NIGC National Training Conference Evaluation

Course Name: Ethical Considerations for Regulators

NIGC greatly appreciates your feedback to aid in our Training offerings.

When filling out the evaluation, please use the ranking scale of 1-5 as noted.	***1 Extremely Dissatisfied***	***2 Dissatisfied***	***3 Neutral***	***4 Satisfied***	***5 Extremely Satisfied***
Did the training meet your expectations?					
Presentation materials were useful/effective. (i.e., PowerPoint, videos, handouts, etc.)					
Presentations and materials are clear.					
Overall I would rate the presentations:					
Was the presenter(s) knowledgeable in the subject matter?					
Overall, I would rate the presenter(s):					

Please provide additional details relevant to your scores above.

How do you feel NIGC can improve for future trainings?

Please list any recommendations for future training topics.

Panel: The Regulatory Landscape

NIGC National Training Conference Evaluation

Course Name: Panel: The Regulatory Landscape

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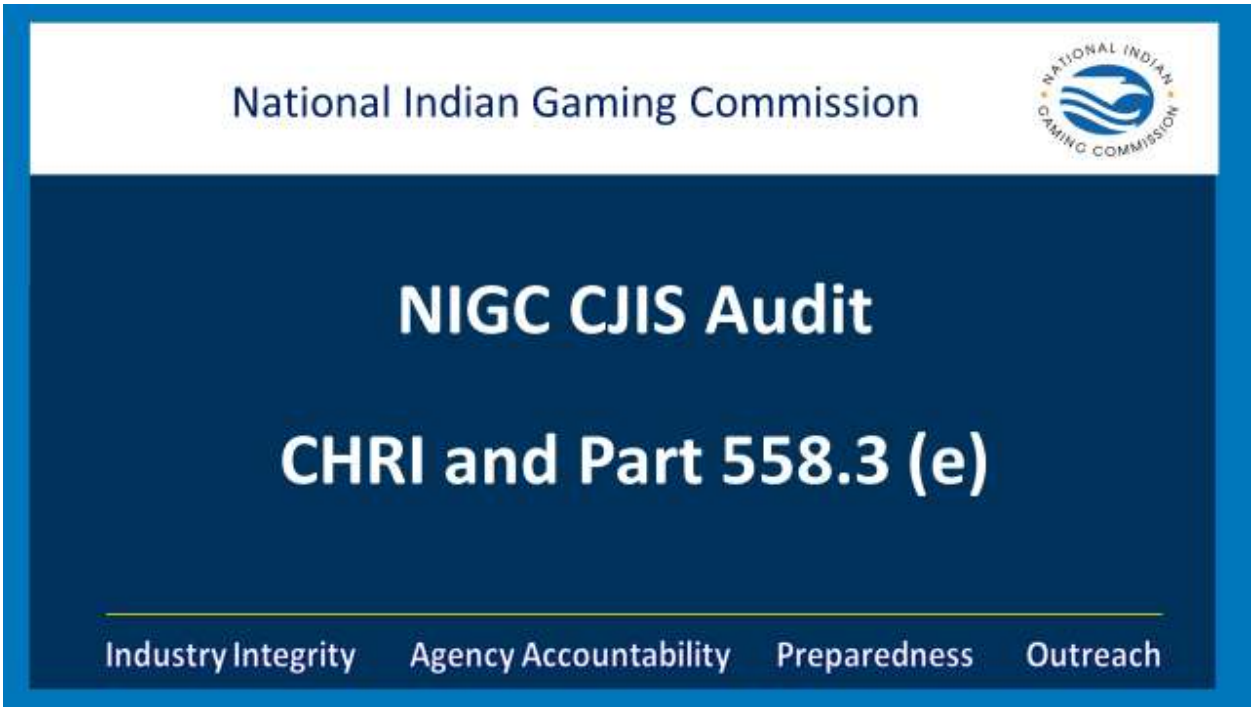
Presentations and materials are clear.					
Overall I would rate the presentations:					
Was the presenter(s) knowledgeable in the subject matter?					
Overall, I would rate the presenter(s):					

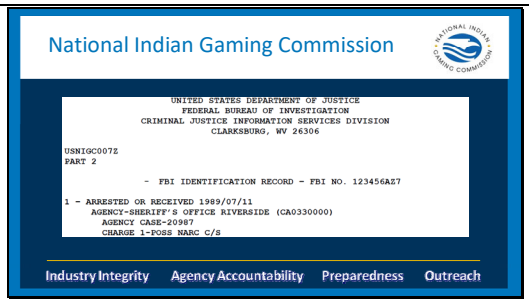
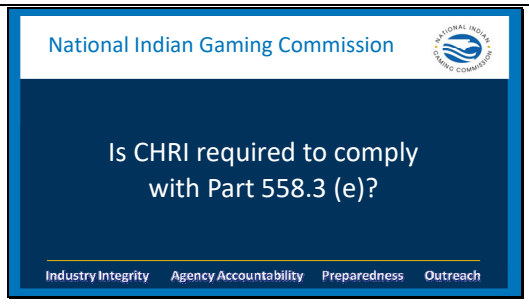
Please provide additional details relevant to your scores above.

How do you feel NIGC can improve for future trainings?

Please list any recommendations for future training topics.

Criminal History Record Information (CHRI) and Compliance with 25 CFR Part 558.3(e)



Slide 1		**PARTICIPANT GUIDE** Chairman Simermeyer promotes four emphasis areas in the Agency's work. This training reinforces these four emphasis areas and the agency's commitment to the Indian gaming industry and Indian Country. The NIGC Criminal Justice Information Services (CJIS) Audit Unit (CAU) is responsible for the implementation of the NIGC's external and internal compliance strategies to achieve and demonstrate compliance with the Memorandum of Understanding (MOU) between the Federal Bureau of Investigation (FBI) and NIGC concerning Noncriminal Justice Fingerprint Submissions. CAU audit staff deliver trainings, technical assistance and conduct selective audits / investigations of those tribes with an executed, suspended, or terminated MOU with the NIGC regarding CHRI.
Slide 2		**PARTICIPANT GUIDE** There are two fingerprinting processes to obtain CHRI results through the NIGC—electronic fingerprint and hard card fingerprint submissions. Tribes submit fingerprint *images* and receive Criminal History Record Information (CHRI).
Slide 3		**PARTICIPANT GUIDE** This is Criminal History Record Information (CHRI). CHRI means information collected by criminal justice agencies about individuals, consisting of identifiable descriptions and notations of arrests, detentions, indictments, or other formal criminal charges, and any disposition arising therefrom, including acquittal, sentencing, correctional supervision, and release. CHRI also includes information that is transferred or reproduced directly from CHRI or information that confirms the existence or nonexistence of CHRI. CHRI includes any media that contains it, such as: Letters, emails, documents, notes, conversations – in person or via phone/text, and spreadsheets or tables. Examples of CHRI potentially include: notice of results (NORs), investigative reports (IRs), licensing objection letters, and other summaries of CHRI. Updating the NOR to remove the FBI CHRI results can help eliminate summary CHRI.
Slide 4		**PARTICIPANT GUIDE** Is CHRI required to be maintained to comply with Part 558.3(e)? What do you need to know about the CJIS Security Policy 4.2.4? CJIS Security Policy (CJISSECPOL) Section 4.2.4, Storage When CHRI is stored, agencies shall establish appropriate administrative, technical and physical safeguards to ensure the security and confidentiality of the information. These records shall be stored for extended periods only when they are key elements for the integrity and/or utility of case files and/or criminal record files. See Section 5.9 for physical security controls. See https://le.fbi.gov/cjis-division-resources/cjis-security-policy-resource-center

Slide 5		**PARTICIPANT GUIDE** **<u>§558.3 Notification to NIGC of license decisions and retention obligations.</u>** (e) A tribe shall retain the following for inspection by the Chair or his or her designee for no less than three years from the date of termination of employment: (1) Applications for licensing; (2) Investigative reports; and (3) Eligibility determinations. See https://nigc.gov/general-counsel/commission-regulations
Slide 6		**PARTICIPANT GUIDE** How do you sanitize CHRI? Information is not considered CHRI if it is obtained as a result of using CHRI received from a national FBI check as a lead to reach out to source record owners such as local courts or state criminal history record repositories. As a prerequisite, both the process used to obtain the source record information and the resulting source record information itself must not directly reference or be attributed to the national FBI check. Information is considered CHRI if it confirms the existence or nonexistence of CHRI. See https://www.nigc.gov/images/uploads/ngi-audit-noncriminal-policy-reference-guide-june-2022.pdf
Slide 7		**PARTICIPANT GUIDE** See https://nigc.gov/images/uploads/bulletins/NIGCBulletin2022-3_CHRI_Retention_20220603.pdf
Slide 8		**PARTICIPANT GUIDE** The NIGC has spent the past couple of years providing CJIS training and has a multitude of resources available at https://nigc.gov/technology/cjis-resource-materials If you need CJIS technical assistance, please email us at cau@nigc.gov

BULLETIN

No. 2022-3 **June 3, 2022**

Subject: Criminal History Record Information (CHRI) Retention

The NIGC processes fingerprints submitted by tribes for background investigations of primary management officials (PMO) and key employees (KE). Prior to issuing a gaming license to a PMO or KE, a tribe is required to perform a fingerprint check through the FBI[1] records system as part of the background investigation on each applicant. The criminal history record information CHRI[2] obtained as a result of the check assists the tribe in determining the applicant's eligibility for employment.

This bulletin addresses FBI CHRI retention obligations and how these obligations may intersect with the National Indian Gaming Commission (NIGC) regulatory mandates for retaining primary management official and key employee licensing applications, eligibility determinations, and investigation reports.

I. CHRI & CHRI Dissemination

Initially, it is important to understand the functions and purpose of the CHRI. CHRI comprises "information collected by criminal justice agencies on individuals consisting of identifiable descriptions and notations of arrests, detentions, indictments, information[ ], or other formal criminal charges, and any disposition arising therefrom, including acquittal, sentencing, correctional supervision, and release. The term does not include identification information such as fingerprint records if such information does not indicate the individual's involvement with the criminal justice system."[3] CHRI is also information that is transferred or reproduced directly from CHRI or information that confirms the existence or nonexistence of CHRI.[4] CHRI includes

[1] Federal Bureau of Investigation.
[2] Criminal History Record Information.
[3] 28 C.F.R. § 20.3.
[4] *See* Next Generation Identification Audit, Noncriminal Justice Access to Criminal History Record Information, Policy Reference Guide (hereinafter NGI) at 1 (Apr. 6, 2020).

any media that contains CHRI, such as: letters, emails, documents, notes, conversations— in person or via phone/text, and spreadsheets or tables.[5]

In order to assist, TGRAs[6] determine the eligibility of applicants for key employee (KE) or primary management official (PMO) positions in their gaming operation(s), the NIGC obtains CHRI from the FBI on these applicants and disseminates it to the TGRAs. The NIGC provides this assistance pursuant to a joint MOU[7] between the agency and TGRAs, which memorializes the parties' understandings and responsibilities regarding the submission of noncriminal justice fingerprints and the transmittal, receipt, storage, use, and dissemination of CJI[8] and CHRI. As noted, this bulletin's focus is retention of CHRI after its proper use.

II. CHRI Retention Obligations

A. CHRI retention

So how long must TGRAs retain CHRI? CHRI may be destroyed as soon as practicable by TGRAs—potentially at the conclusion of a licensing appeal process or the CHRI audit process (whichever comes later), in accordance with the TGRA's media sanitization and destruction policy. The FBI CJIS Security Policy instructs that CHRI "records shall be stored for extended periods only when they are key elements for the integrity and/or utility of case files and/or criminal records."[9] Further, the policy indicates that "[p]hysical media shall be securely disposed of when no longer required . . .."[10]

B. CHRI & NIGC regulatory retention requirements

i. Investigation reports & sanitizing CHRI

NIGC regulations do not require that CHRI itself be retained,[11] just summary CHRI *if* it is transferred into an investigation report.[12] Specifically, NIGC regulations, Sections 556.6 (b)(2)(iii)(C) and (D) require that an investigation report include "every known criminal charge . . ." and "every felony . . .." So TGRAs may put summary CHRI in an investigation report. Under NIGC regulations, an investigation report must be retained by a TGRA for three (3) years from the date of the primary management official (PMO) or key employee's (KE) employment termination date.[13]

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[5] *Id.*
[6] Tribal Gaming Regulatory Agencies.
[7] Memorandum of Understanding.
[8] Criminal Justice Information is the term used for the FBI Criminal Justice Information Services (CJIS) provided data necessary for law enforcement and civil agencies to perform their missions including, but not limited to biometric, identity history, biographic, property, and case/incident history data.
[9] *See* CJIS Security Policy, Section 4.2.4.
[10] *Id.* at Section 5.8.4.
[11] *See* 25 C.F.R. parts 556 and 558.
[12] *See* 25 C.F.R. §§ 556.6 (a) & (b)(2)(iii)(C) and (D); 558.3(e).
[13] 25 C.F.R. § 558.3(e).

But TGRAs may avoid putting summary CHRI in investigation reports—and maintaining CHRI for a significant period of time with its required protections[14]—by sanitizing the CHRI. To sanitize CHRI, TGRAs use it as a lead to reach out to source record-owners, such as local courts or state criminal history record repositories, and obtain the original criminal history[15]. Importantly, both the process used to acquire the source record information and the resulting original criminal history information must not directly reference or be attributed to the national FBI check. This is because information is considered CHRI if it confirms the existence or nonexistence of CHRI.

ii. Licensing applications & eligibility determinations

The other documents that NIGC regulations direct be held for three years after a KE or PMO's termination do not necessitate the inclusion of CHRI or a summary of it.[16] Applications for KE and PMO licensing explicitly contain only information *from* the applicant.[17] NIGC regulations require that "[a] tribe shall request from each primary management official and from each key employee [certain] information . . . ," including felony, misdemeanor, and criminal charges.[18] Such information is not CHRI though, because it is not from a criminal justice agency.[19] And fingerprints given as part of that application also are not CHRI.[20]

Eligibility determinations simply require that the TGRA review a person's criminal record and determine if they are suitable.[21] So eligibility determinations should not include CHRI or a summary of it. Of course TGRAs need to be careful not to summarize, reproduce, or confirm the existence or nonexistence of CHRI in eligibility determinations, as that constitutes summary CHRI.[22] If TGRAs do include CHRI in the eligibility determination, then it must be maintained for three (3) years from the date of the PMO or KE's employment termination.

iii. Abbreviated background investigations

Finally, CHRI results also may be destroyed as soon as practicable when TGRAs implement an abbreviated background investigation process. This occurs when after the

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[14] *See* CJIS Security Policy, Sections 4 and 5; *see also* NIGC Bulletin No. 2020-2, *Fingerprint processing — applicant Privacy Act rights and protecting CHRI* at 3-4 (Feb. 18, 2020), https://www.nigc.gov/images/uploads/bulletins/Bulletin_-_Privacy_Act_rights_protecting_CHRI_-_FINAL_FINAL.pdf

[15] Or, in other words, source record information.

[16] *See* 25 C.F.R. § 558.3(e).

[17] *See* 25 C.F.R. § 556.6(a) ("the tribe shall maintain a complete application file containing the information listed under 556.4(a)(1) through (14)").

[18] *See* 25 C.F.R. § 556.4(a).

[19] *See* 28 C.F.R. § 20.3(g)(2).

[20] *See* National Identity Services Audit Noncriminal Justice Access to CHRI, Policy Reference Guide at 1 (07/22/2019) (CHRI "does not include identification information such as fingerprint records if such information does not indicate the individual's involvement in the criminal justice system.").

[21] *See* 25 C.F.R. § 556.5.

[22] *See* National Identity Services Audit Noncriminal Justice Access to CHRI, Policy Reference Guide at 1 (07/22/2019) ("Information is considered CHRI if it is transferred or reproduced directly from CHRI received as a result of a national FBI Check . . .. Information is considered CHRI if it confirms the existence or nonexistence of CHRI.")).

submission of a completed application, CHRI is requested, evaluated, and then used to ask the applicant to withdraw their application. In those cases, TGRAs do not prepare an investigation report, make an eligibility determination, or create and submit a Notice of Results (NOR). Consequently, summary CHRI is not contained in any of those documents and may be destroyed upon the application's withdrawal, in accordance with the TGRA's media sanitization and destruction policy.

III. Conclusion

In sum, NIGC regulations do not require that CHRI results themselves be retained, and such results may be destroyed as soon as practicable by a TGRA. Also, TGRAs must be careful to sanitize CHRI for purposes of investigation reports and avoid including summary CHRI or confirming its existence or nonexistence in eligibility determinations. Doing so ensures that CHRI is not subject to the NIGC regulatory retention requirements for investigation reports and eligibility determinations.

Should you have any questions regarding the information covered in this bulletin, please contact a NIGC Region Office or the CJIS Audit Unit at cau@nigc.gov.

NIGC National Training Conference Evaluation

Course Name: Criminal History Record Information (CHRI) and Compliance with 25 CFR Part 558.3(e)

NIGC greatly appreciates your feedback to aid in our Training offerings.

When filling out the evaluation, please use the ranking scale of 1-5 as noted.	***1 Extremely Dissatisfied***	***2 Dissatisfied***	***3 Neutral***	***4 Satisfied***	***5 Extremely Satisfied***
Did the training meet your expectations?					
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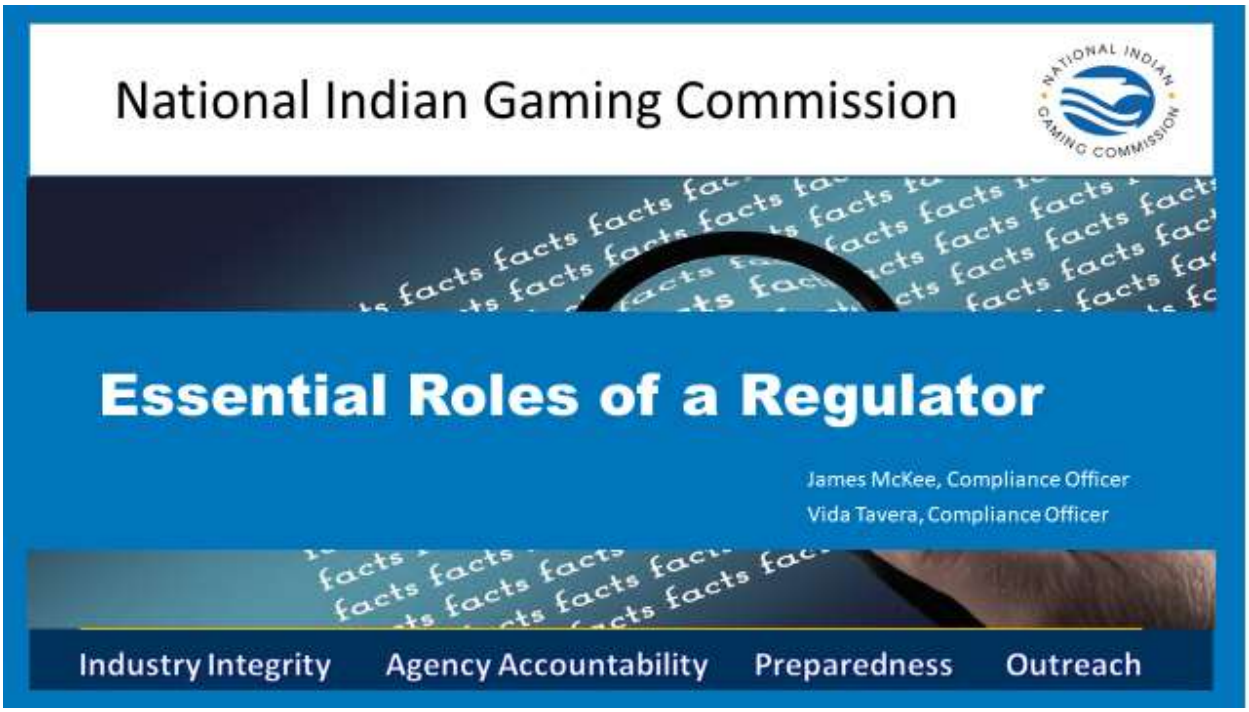
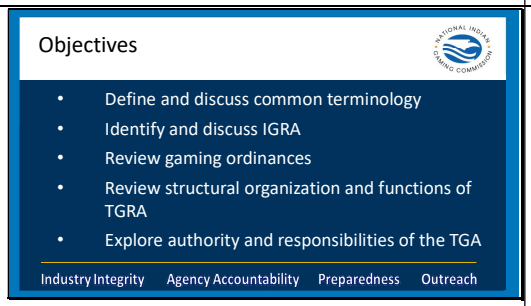
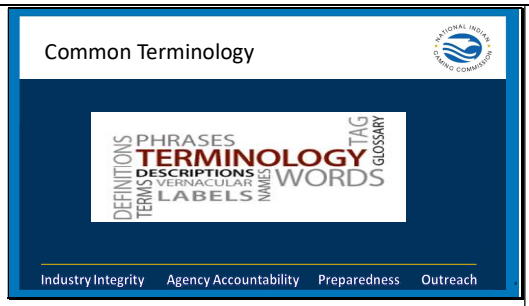
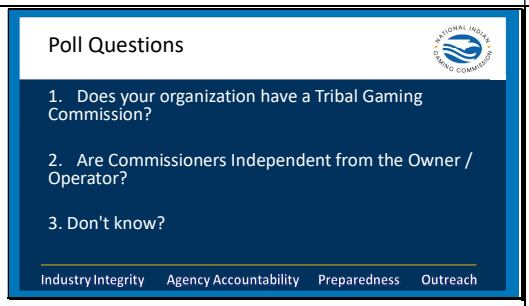
Please list any recommendations for future training topics.

Essential Roles of a Regulator Participant Guide



Essential Roles of a Regulator Participant Guide

Slide 1		
Slide 2		**Key Points** Define and discuss common terminology Identify and discuss IGRA Review gaming ordinances Review structural organization and function of TGRA Explore Authority and Responsibilities of the TGRA
Slide 3		**Key Points** If something is said or a term is used you are unfamiliar with, please let us know.

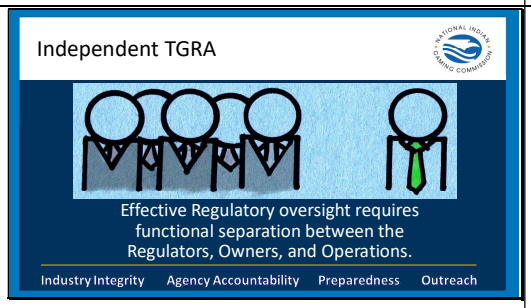
Slide 4		**Key Points** **Agency Names** Tribal Gaming Commission Tribal Gaming Agency Tribal Gaming Authority Tribal Gaming Regulatory Authority **Titles and Terms** Commissioner Gaming Inspector Compliance Officer Internal Auditor MICS,TICS, SICS Owner (Tribe) Operations(Mgmt.)
Slide 5		**Key Points** 1. Yes / No 2. Yes / No 3. Yes

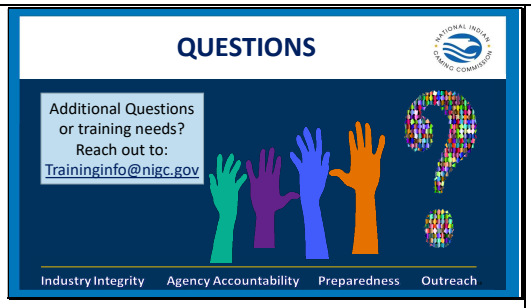
Slide 6		**Key Points** **The Indian Gaming Regulatory Act's (IGRA) History** IGRA (25 U.S.C. §§ 2701 – 2721) was enacted in 1988 in the wake of *Cabazon* • maintains Tribes as primary regulators • Established the regulatory role of the National Indian Gaming Commission (NIGC) for Class II gaming (States regulate Class III) The tribal/state compact defines who regulates class III, it could be State, Tribe or both. • Established the legal framework Tribes' are required to comply with in regards to gaming on tribal lands. Purpose of IGRA (25 U.S.C. §2702): • Promote tribal economic development, self-sufficiency, and strong tribal governments • Shield tribes from organized crime • Ensure tribes are the primary beneficiary of the gaming activities • Ensure gaming is conducted fairly and honestly • Establish federal regulatory authority for gaming on Indian lands

Slide 7		**Key Points**
		Tribal law creates TGRA authority to regulate gaming.
		Before gaming commences, a tribe must have a gaming ordinance approved by the NIGC Chair.
		A gaming ordinance provides the foundation in which a tribe may regulate gaming.
		Each tribe is encouraged to tailor a gaming ordinance that best suits their needs.
		• Incorporating IGRA & NIGC regulation requirements.
		  • Example – Model Gaming Ordinance (www.nigc.gov/compliance/bulletins)
		  • Published January 10, 2018
		Separate from the gaming ordinance/code are the tribal rules and regulations. The rules and regulations are more in-depth as opposed to the ordinance informing the public about the law. The rules and regulations inform the public how the law will be carried out.
		Tribal rules and regulations do not need NIGC approval. Tribal rules and regulations may be revised at any time and do not need to be reviewed by the NIGC.

Slide 8		**Key Points** **Structural Organization and Operational Function** Matters to be considered and possibly included in the Ordinance or Laws establishing the TGRA: • Clearly defined responsibilities, powers, and enforcement Authority • Number of Commissioners, term length, selection process, removal process, time commitment, and continuity of the Commission • Funding should be appropriated from the Government, not by the Gaming Operation • Procedures for conducting official commission business and appeal/hearing procedures for Commission Action • Procedures for regular reports to Tribal Government on the health of the gaming operation from the Regulatory perspective (Monthly Stats on Incidents, Crimes, Internal Control Violations, etc.)

Slide 9		**Key Points** ***Common Structures** ***Working Commission** - Commissioners have offices on-site and participate with the day-to-day regulation of the facility. Act as permanent employees of the TGRA. ***Board Style** - Delegates the day-to-day regulatory oversite to regulatory employees on site. Meets periodically and often has term limits. **Combination working and board** – Where some commissioners are full time capacity and others on stipend for meetings.
Slide 10		**Key Points** **In a round table:** Select someone to write and someone to present to the group. Using the large post-IT, discuss and write out your day-to-day responsibilities.

Slide 11		**Key Points** The TGRA has authority in regulating gaming. The passing of IGRA provided some specific requirements and submissions. The bulk of the responsibilities are left to the Tribe.
Slide 12		**Key Points** • Clearly defined and established by Ordinance or Tribal law • Separate arm of the Tribal Government • Exclusively for regulation and monitoring of the gaming operations
Slide 13		**Key Points** Try to maintain a focus on regulatory issues and achieve the organization's goals. TGRA's do not manage the facility, their job is to make sure that the facility operates within Tribal, Federal laws and if applicable within the regulations set forth in the State Compact. Ask yourself, How does each task or TGRA responsibility help meet your regulatory mission and organizational goals?

Slide 14		**Key Points** If you have any questions or would like information about additional topics and training please contact the NIGC training department at traininginfo@nigc.gov.

NIGC National Training Conference Evaluation

Course Name: Essential Roles of a Regulator

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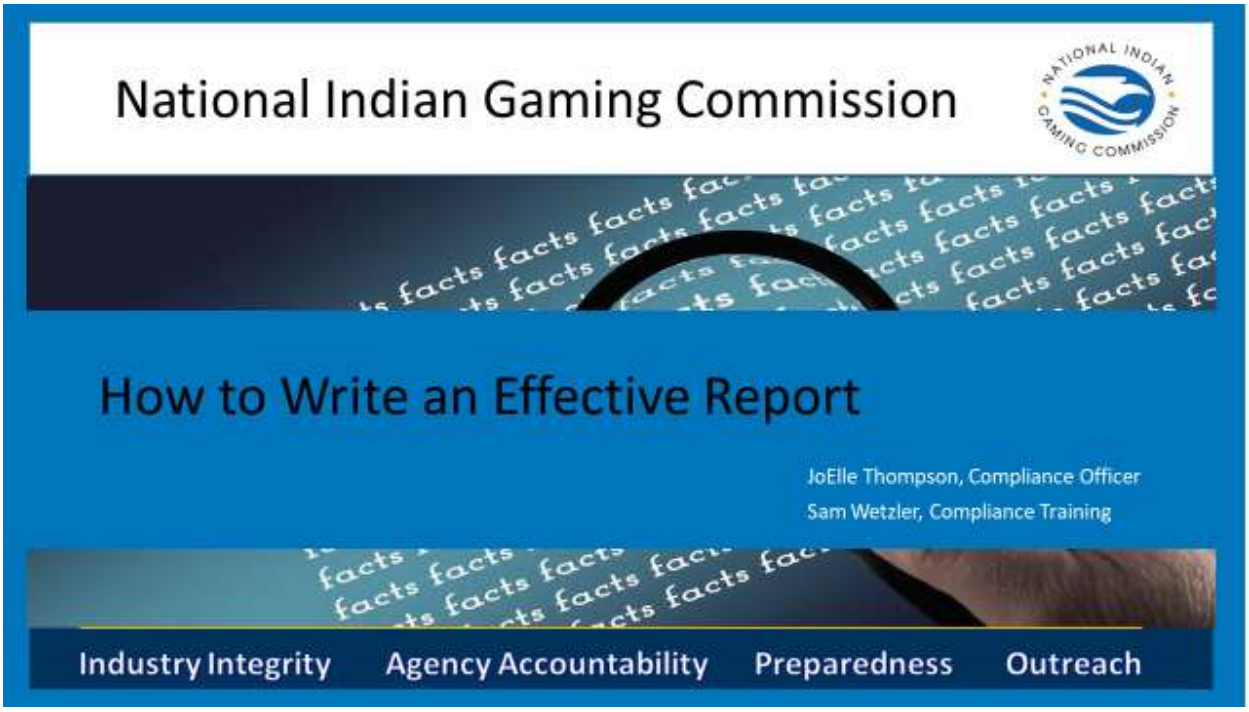
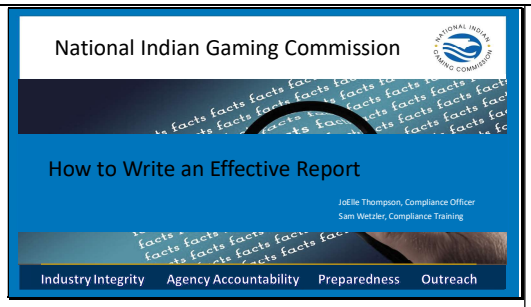
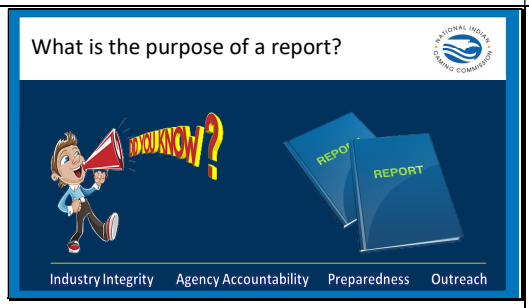
Please list any recommendations for future training topics.

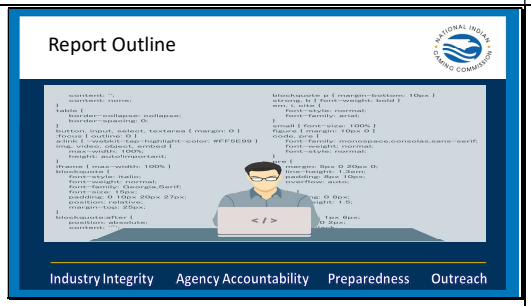
Report Writing Participant Guide

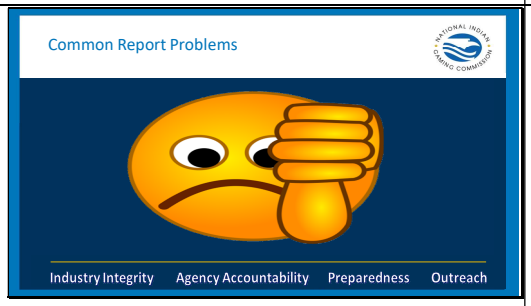


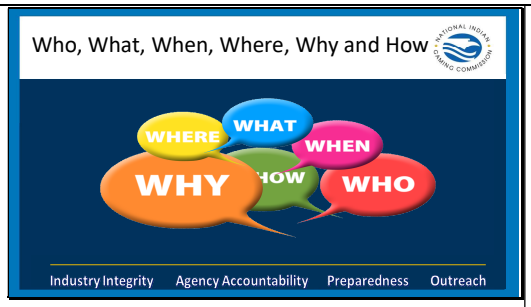
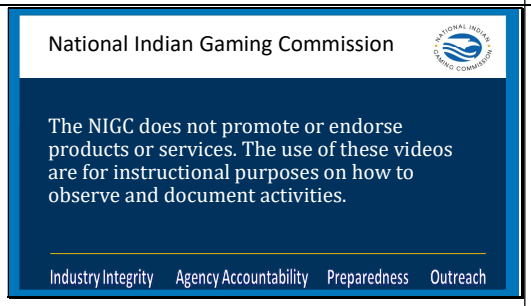
Report Writing Participant Guide

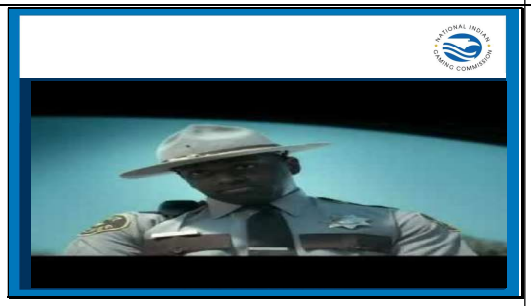
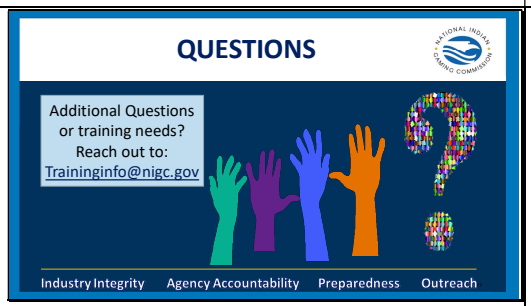
Slide 1		**KEY POINTS** Welcome to "How to Write an Effective Report"
Slide 2		**KEY POINTS** General Principle of report writing, helpful hints and understanding best practices is the goal of this session.
Slide 3		**KEY POINTS** Eschew Obfuscation means to avoid ambiguity, adopt clarity

Slide 4		**KEY POINTS** Definition of a Report: Verb: Give a spoken or written account of something that one has observed, heard, done, or investigated. *Noun: A*n account given of a particular matter, especially in the form of an official document, after thorough investigation or consideration by an appointed person or body.
Slide 5		**KEY POINTS** Provide decision makers with information to reach a disposition.

Slide 6		**KEY POINTS** Please see handout "how to write an effective report."
Slide 7		**KEY POINTS** Major Components: • The facts • The policy, procedure, regulation, law • The evidence • The analysis • The conclusion
Slide 8		**KEY POINTS** Introduction – summary Body- detailed facts Conclusion – wraps up the analysis that guided the results of the investigation

Slide 9		**KEY POINTS** Do – use third person voice, document, use paragraphs if necessary Don't – use slang, opinions for facts, judgement before completion or submission without proofreading.
Slide 10		**KEY POINTS** See attachment "how to write an effective report"
Slide 11		**KEY POINTS** See attachment "how to write an effective report"

Slide 12		**KEY POINTS** See handout "how to write an effective report"
Slide 13		
Slide 14		**KEY POINTS** Individual Activity Time: 15-30 mins.

Slide 15		
Slide 16		
Slide 17		**KEY POINTS** If you have any questions or would like information about additional topics and training please contact the NIGC training department at traininginfo@nigc.gov.

How to Write an Effective Report
Course Handout

I. Purpose

a) To document an impartial account of the facts and circumstances of an event.

b) Defend Investigation

II. Helpful Hints

a) Write the report in a Microsoft Word or similar Software and copy the text into the final report format.

b) Complete every section of the report form, if utilized. Include the date, time, location, and the reason for the report in the text of the report.

c) Be detailed as it relates to the facts. If someone was helpful or uncooperative, describe the actions of the person.

d) Outline Components

e) Introduction (the beginning) – The introduction should include a summary of the event and investigation. Describe the event, investigation plan, relevant regulations or laws and the result.

f) The body (the middle) - of the report should detail the facts of the event, the scope of the investigation, the evidence gathered, the evidence reviewed and the analysis of the evidence.

g) The conclusion (the end) should explain how, the analysis guided the results of the investigation.

III. Effective Characteristics

a) Well organized

b) Grammatically correct

c) Defines all necessary terms, abbreviations and acronyms

d) Accurate

e) Specific Objective

f) Clear, Complete, Concise

IV. Common Problems

a) Confusing

b) Lack organization

c) Not enough relevant details

d) Not concise

e) Poor grammar, punctuation, spelling

f) Incorrect word use

g) Use of terms, abbreviation and acronyms without explanation

V. WWWWWH

a) Noticing details that matter – Height, clothing, speech, accent, things in the hand. Notice things, don't focus too much on describing them.

b) Surroundings – Place, weather, crowded or not, temperature

c) Action – What was happening, what are you describing?

d) Subject – Who is the center of the action, the person doing the activity or the person who is the subject of the activity?

e) Result – What happened as a result between the subject of the action and the object of the action?

Notes:

Report Writing Scenario #1

Directions: review the video while taking notes to identify the WWWWHW.

Please write a short report using ***Who***, ***What***, ***When***, ***Where***, ***Why*** and ***How***.

WHO

WHAT

WHEN

WHERE

WHY

HOW

Report Writing Scenario #2

Directions: review the video while taking notes to identify the WWWWHW.

Please write a short report using ***Who***, ***What***, ***When***, ***Where***, ***How*** *and* ***Why***.

WHO

WHAT

WHEN

WHERE

WHY

HOW

NATIONAL INDIAN
GAMING COMMISSION

NIGC National Training Conference Evaluation

Course Name: Report Writing

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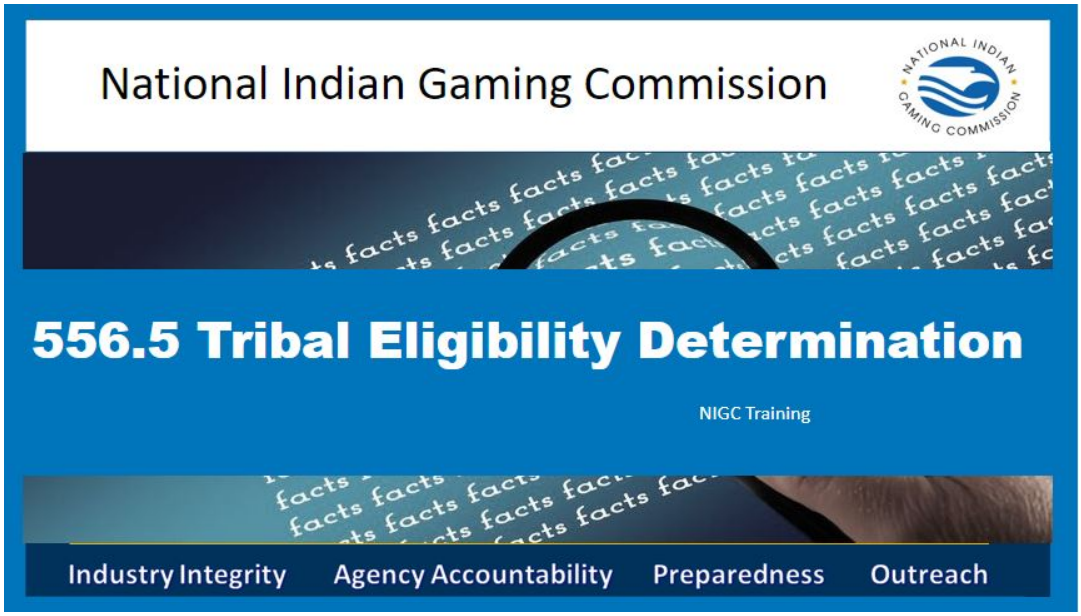
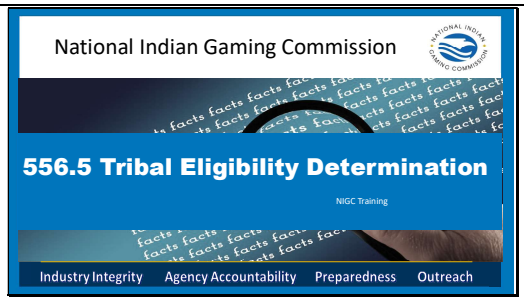
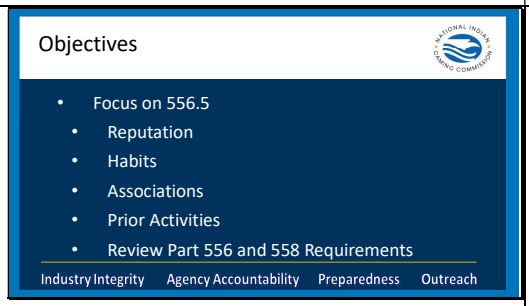
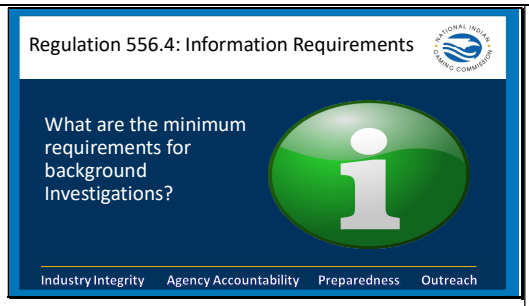
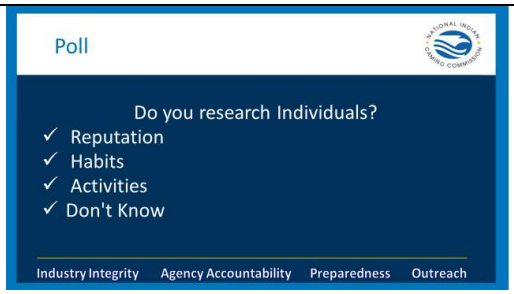
Background Investigations: Eligibility Determination for Nuanced Standards
Participant Guide

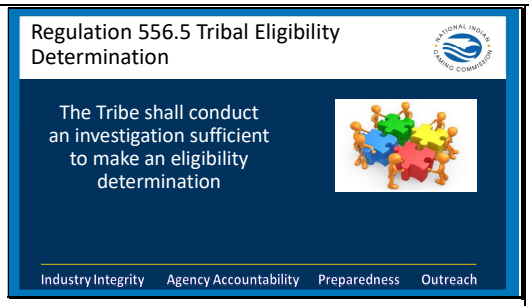


Background Investigations:
Eligibility Determination for Nuanced Standards
Participant Guide

Slide 1		**KEY POINTS** Welcome to Tribal Eligibility Determination.
Slide 2		**KEY POINTS** Going beyond the bear minimum Focus on 556.5 “Tribal Eligibility Determination” with a focus on the Reputation, Habits and Associations as well as prior activities.

Slide 3		**KEY POINTS** • Touch on Notification requirement to NIGC (NOR, and Licensing notifications) and this is only a small piece of a much larger process • 556.4 details the specific information that must at a minimum be requested from every applicant applying for KE or PMO position. • This required information provides a starting point in the background investigative work
Slide 4		**KEY POINTS** How do you decide if an applicant is eligible for a gaming license? **NIGC 556.5 says** **A Tribe shall conduct an investigation sufficient to make an eligibility determination.** • To make a finding concerning the eligibility of a key employee or primary management official for granting of a gaming license, an authorized tribal official shall review a person's: **(1) Prior activities;** **(2) Criminal record, if any; and** **(3) Reputation, habits and associations.** (b) **If** the authorized tribal official, in applying the standards adopted in a tribal ordinance, determines that

		licensing of the person poses a threat to the public interest or to the effective regulation of gaming, or creates or enhances the dangers of unsuitable, unfair, or illegal practices and methods and activities in the conduct of gaming, an authorizing **Tribal official shall not license that person** in a key employee or primary management official position.
Slide 5		**KEY POINTS** Show of Hands • Reputation • Habits • Activities • Don't know?

Slide 6		**KEY POINTS** **What is considered sufficient and adequate?** **§ 556.5 Tribal eligibility determination.** A tribe shall conduct an investigation sufficient to make an eligibility determination. (a) To make a finding concerning the eligibility of a key employee or primary management official for granting of a gaming license, an authorized tribal official shall review a person's: **(1) Prior activities;** **(2) Criminal record**, if any; and **(3) Reputation, habits, and associations.** (b) If the authorized tribal official, in applying the standards adopted in a tribal ordinance, determines that licensing of the person poses a threat to the public interest or to the effective regulation of gaming, or creates or enhances the dangers of unsuitable, unfair, or illegal practices and methods and activities in the conduct of gaming, an authorizing tribal official shall not license that person in a key employee or primary management official position.

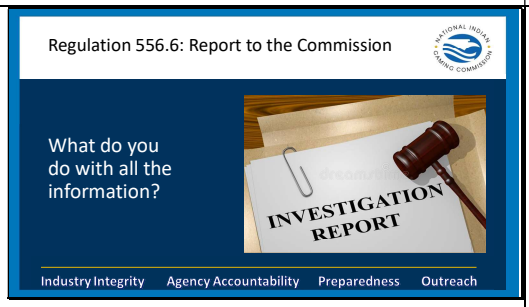
Slide 7		**KEY POINTS** Setting a licensing standard for PMO's/Key/Non-Key licensee's: **Activity #1** **Directions:** Working as a group, determine and develop a list of Prior activities, Crime(s), Reputation, Habits, or Associations, that would disqualify an applicant from being licensed.
Slide 8		**KEY POINTS** Let's brainstorm some avenues we might be able to make use of in making an eligibility determination

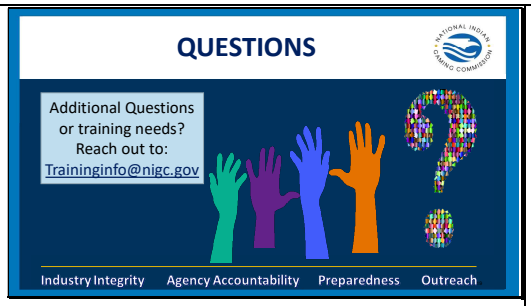
Slide 9		**KEY POINTS** Criminal records may include fingerprinting, State, City, County or governing jurisdiction.
Slide 10		**KEY POINTS** Free records checks can help you verify information provided from your applicant. • Pacer • State courts • **NIGC Tribal Access Portal** • Other TGRA's- you can develop a reference form to send to other TGRA's to verify licensing information from them.

Slide 11		**KEY POINTS** Your reputation precedes you.
Slide 12		**KEY POINTS** **Activity #2** Let's look up a name using google and see what we can simply see by opening a page or two associated with the name:

Slide 13		**KEY POINTS** Why should you consider utilizing social media? Studies have shown a majority of Facebook, Snapchat and Instagram users say they visit these platforms on a daily basis.
Slide 14		**KEY POINTS** • Google • LinkedIn • Facebook • Instagram

Slide 15		**KEY POINTS** How do you discern an individual's habits?
Slide 16		**KEY POINTS** How do you note or look into an individual's associations?

Slide 17		**KEY POINTS** **Activity #3** **Activity:** Using the first activity of setting a criteria or standards to obtain a license: Based upon the information reviewed and verified and the investigative findings, and taking into consideration the applicant's prior activities, criminal record, if any, reputation, habits, associations, the applicant/licensee is Eligible or Not Eligible for a license.
Slide 18		**KEY POINTS** Before issuing a license to a primary management official or a key employee, a Tribe shall: • Create and maintain an investigative report on each background investigation. An investigative report shall include all of the following: (i) Steps taken in conducting a background investigation; (ii) Results obtained; (iii) Conclusions reached; and (iv) The basis for those conclusions.

Slide 19		**KEY POINTS** If you have any questions or would like information about additional topics and training please contact the NIGC training department at traininginfo@nigc.gov.

Course: Background Investigations: Eligibility Determination for Nuanced Standards

Activity 1: Disqualifying Standards for PMO/KEY/Non-Key licensee

Directions: Working as a group, determine and develop a list of Prior activities, Crime(s), Reputation, Habits, or Associations, that would disqualify an applicant from being licensed.

Example: Multiple assault convictions

Activity: Eligibility Determination (25 C.F.R. 558.3)

Using the first activity of setting a criteria or standards to obtain a license: Based upon the information reviewed and verified and the investigative findings, and taking into consideration the applicant's prior activities, criminal record, if any, reputation, habits, associations, the applicant/licensee is ELIGIBLE or NOT ELIGIBLE for a license:

Scenario #1	Eligible	Not Eligible
Background investigator provided TGRA with social media images of applicant hanging out with known gang members		
A review of the applicants RAP sheet indicated 10 charges in the past 8 years for theft or writing of worthless checks but all charges were dismissed		
Work and residence history shows nothing negative		

Scenario #2	Eligible	Not Eligible
Routine search of social media found images from the The Blue Knights motor cycle club. Additionally active in toys for tots program, big brother and sisters.		
A review of the applicants' RAP sheet indicated 1 charge 23 years for grand theft, deferred charge.		
Work and residence history shows nothing negative		

Scenario #3	Eligible	Not Eligible
Background investigator documented from social media, images of applicant hanging out with known drug dealers whom are relatives		

A review of the applicants' RAP sheet indicated 2 charges in the past 10 years for misdemeanor theft.		
Review of work history shows 7 jobs with 3 non-responsive contacts 4 responsive noting they would not hire them back		

Scenario #4	Eligible	Not Eligible
Background investigator provided information that the individual in question is associated with the South West Easterly 102nd St Crips.		
A review of the applicants RAP sheet indicated no criminal charges		
Review of work and residence history shows no negative results		

For licensing actions including revocation, denial, suspensions, do you have an appeal process in place?

NIGC National Training Conference Evaluation

Course Name: Background Investigations: Eligibility Determination for Nuanced Standards

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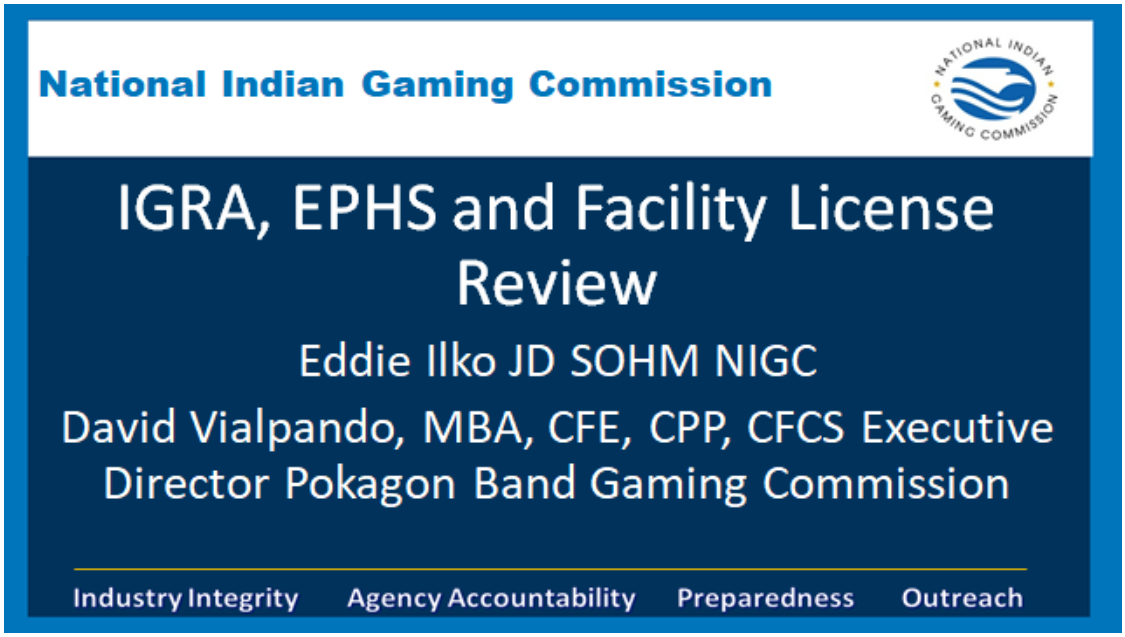
Note Pages

IGRA, EPHS and Facility License Review
Participant Guide



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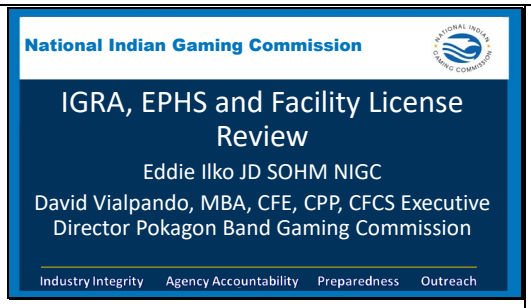
Slide 1		**Key Points:** Chairman Simermeyer promotes four emphasis areas in the Agency's work, and he is committed to being more engaged and accountable to the Indian gaming industry and Indian Country. <u>Industry Integrity</u> Protecting the valuable tool of Indian gaming that in many communities creates jobs, is the lifeblood for tribal programs, and creates opportunities for tribes to explore and strengthen relationships with neighboring jurisdictions. <u>Agency Accountability</u> Meeting the public's expectation for administrative processes that uphold good governance practices and support efficient and effective decision making to protect tribal assets. <u>Preparedness</u> 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. <u>Outreach</u> 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.
Slide 2		**Key Points:** What did Benjamin Franklin feel when he discovered electricity?

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Slide 3		**Key Points:** • Does the gaming operation plan describe the review and incorporation of existing tribal plans? • Does the plan include a description of the method and schedule for keeping the plan current? • Does the plan include a description all natural hazards that can affect the gaming operation? • Does the plan include a description of the impacts of each hazard? • Does the plan contain an action plan for how the actions identified will be prioritized, implemented, and administered?
Slide 4		

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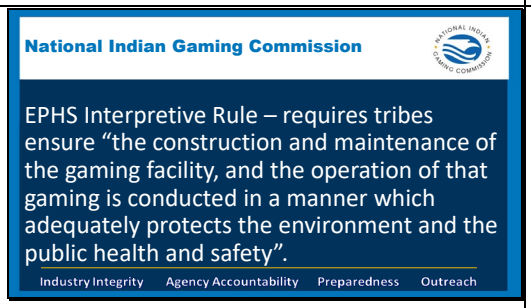
Slide 5		**Key Points:** The Indian Gaming Regulatory Act (IGRA) was enacted in 1988 as Public Law 100-497 and codified at 25 U.S.C. 2701.
Slide 6		**Key Points:** § 2710 (b)(1)(B)(2)(E) the construction and maintenance of the gaming facility, and the operation of that gaming is conducted in a manner which adequately protects the environment and the public health and safety

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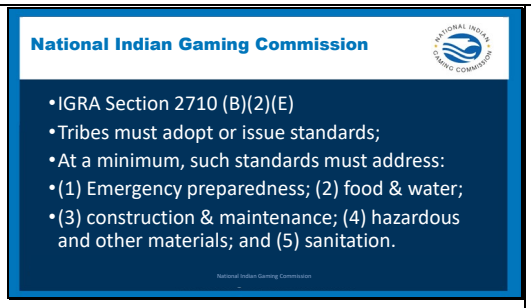
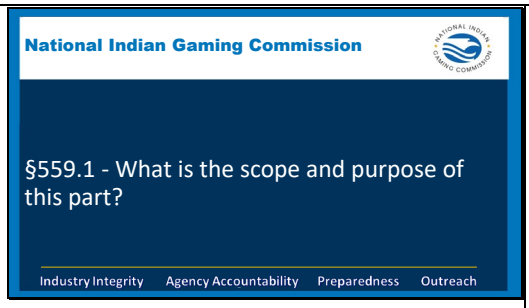
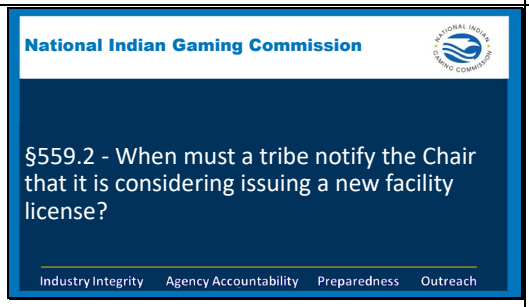
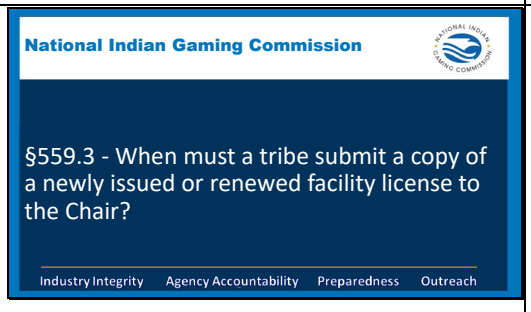
Slide 7		
Slide 8		**Key Points:** Attestation means that the tribe: • affirms to be correct, true, or genuine • certifies by signature or oath; or • certifies in an official capacity

IGRA, EPHS and Facility License Review Participant Guide

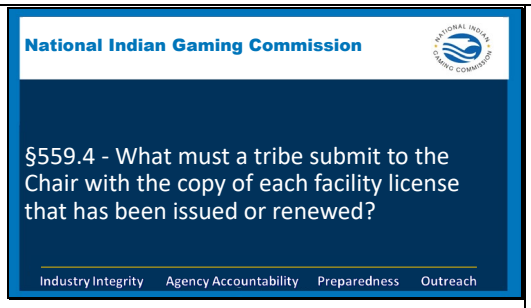
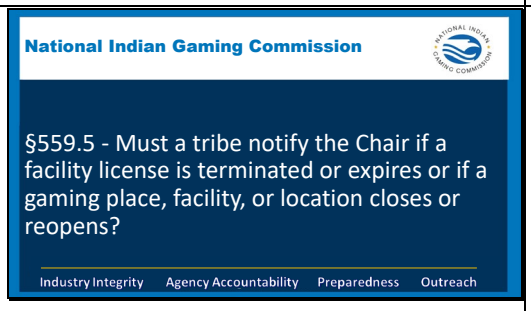
Slide 9		
Slide 10		

IGRA, EPHS and Facility License Review Participant Guide

Slide 11		**Key Points:** §559.1 What is the scope and purpose of this part? (a) The purpose of this part is to ensure that each place, facility, or location where class II or III gaming will occur is located on Indian lands eligible for gaming and obtains an attestation certifying that the construction and maintenance of the gaming facility, and the operation of that gaming, is conducted in a manner that adequately protects the environment and the public health and safety, pursuant to the Indian Gaming Regulatory Act. (b) Each gaming place, facility, or location conducting class II or III gaming pursuant to the Indian Gaming Regulatory Act or on which a tribe intends to conduct class II or III gaming pursuant to the Indian Gaming Regulatory Act is subject to the requirements of this part.
Slide 12		**Key Points:** §559.2 When must a tribe notify the Chair that it is considering issuing a new facility license? (a) A tribe shall submit to the Chair a notice that a facility license is under consideration for issuance at least 120 days before opening any new place, facility, or location on Indian lands where class II or III gaming will occur. (1) A tribe may request an expedited review of 60 days and the Chair shall respond to the tribe's request, either granting or denying the expedited review, within 30 days.

		(2) Although not necessary, a tribe may request written confirmation from the Chair. (b) The notice shall contain the following: (1) The name and address of the property; (2) A legal description of the property; (3) The tract number for the property as assigned by the Bureau of Indian Affairs, Land Title and Records Offices, if any; (4) If not maintained by the Bureau of Indian Affairs, Department of the Interior, a copy of the trust or other deed(s) to the property or an explanation as to why such documentation does not exist; and (5) If not maintained by the Bureau of Indian Affairs, Department of the Interior, documentation of the property's ownership. (c) A tribe does not need to submit to the Chair a notice that a facility license is under consideration for issuance for occasional charitable events lasting not more than one week.
Slide 13		**Key Points:** §559.3 When must a tribe submit a copy of a newly issued or renewed facility license to the Chair? A tribe must submit to the Chair a copy of each newly issued or renewed facility license within 30 days of issuance.

IGRA, EPHS and Facility License Review Participant Guide

Slide 14		**Key Points:** §559.4 What must a tribe submit to the Chair with the copy of each facility license that has been issued or renewed? A tribe shall submit to the Chair with each facility license an attestation certifying that by issuing the facility license, the tribe has determined that the construction and maintenance of the gaming facility, and the operation of that gaming, is conducted in a manner which adequately protects the environment and the public health and safety. This means that a tribe has identified and enforces laws, resolutions, codes, policies, standards or procedures applicable to each gaming place, facility, or location that protect the environment and the public health and safety, including standards, under a tribal-state compact or Secretarial procedures.
Slide 15		**Key Points:** §559.5 Must a tribe notify the Chair if a facility license is terminated or expires or if a gaming place, facility, or location closes or reopens? A tribe must notify the Chair within 30 days if a facility license is terminated or expires or if a gaming place, facility, or location closes or reopens. A tribe need not provide a notification of seasonal closures or temporary closures with a duration of less than 180 days.

IGRA, EPHS and Facility License Review Participant Guide

Slide 16		**Key Points:** §559.6 May the Chair require a tribe to submit applicable and available Indian lands or environmental and public health and safety documentation regarding any gaming place, facility, or location where gaming will occur? A tribe shall provide applicable and available Indian lands or environmental and public health and safety documentation requested by the Chair.
Slide 17		**Key Points:** The NIGC has spent the last year providing related training and has a multitude of resources are available at: https://www.nigc.gov/commission/nigc-guidance-regarding-covid-19 https://www.nigc.gov/utility/human-trafficking-resources https://www.nigc.gov/utility/tech-alerts-and-warnings If you need technical assistance and training please contact your region office or email us at traininginfo@nigc.gov

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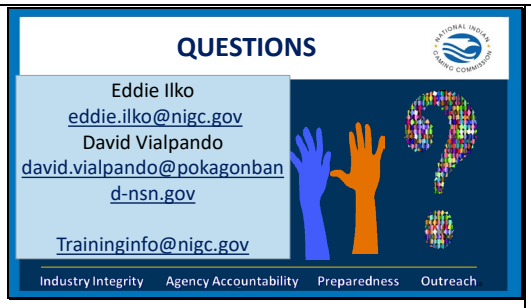
Slide 18		**Key Points:** If you have any questions or would like information about additional topics and training please contact the NIGC training department at traininginfo@nigc.gov.

NIGC National Training Conference Evaluation

Course Name: IGRA, EPHS and Facility License Review

NIGC greatly appreciates your feedback to aid in our Training offerings.

When filling out the evaluation, please use the ranking scale of 1-5 as noted.	***1 Extremely Dissatisfied***	***2 Dissatisfied***	***3 Neutral***	***4 Satisfied***	***5 Extremely Satisfied***
Did the training meet your expectations?					
Presentation materials were useful/effective. (i.e., PowerPoint, videos, handouts, etc.)					
Presentations and materials are clear.					
Overall I would rate the presentations:					
Was the presenter(s) knowledgeable in the subject matter?					
Overall, I would rate the presenter(s):					

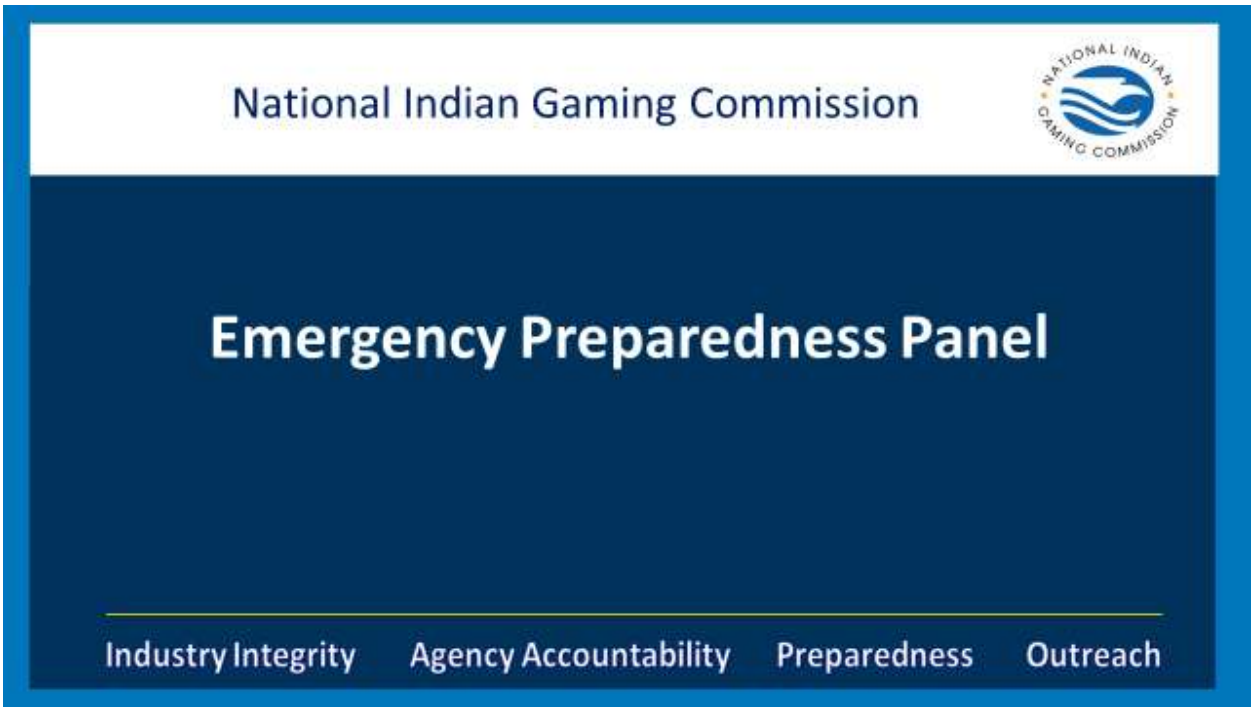
Please provide additional details relevant to your scores above.

How do you feel NIGC can improve for future trainings?

Please list any recommendations for future training topics.

Note Pages

Emergency Preparedness Panel



NIGC National Training Conference Evaluation

Course Name: Emergency Preparedness Panel

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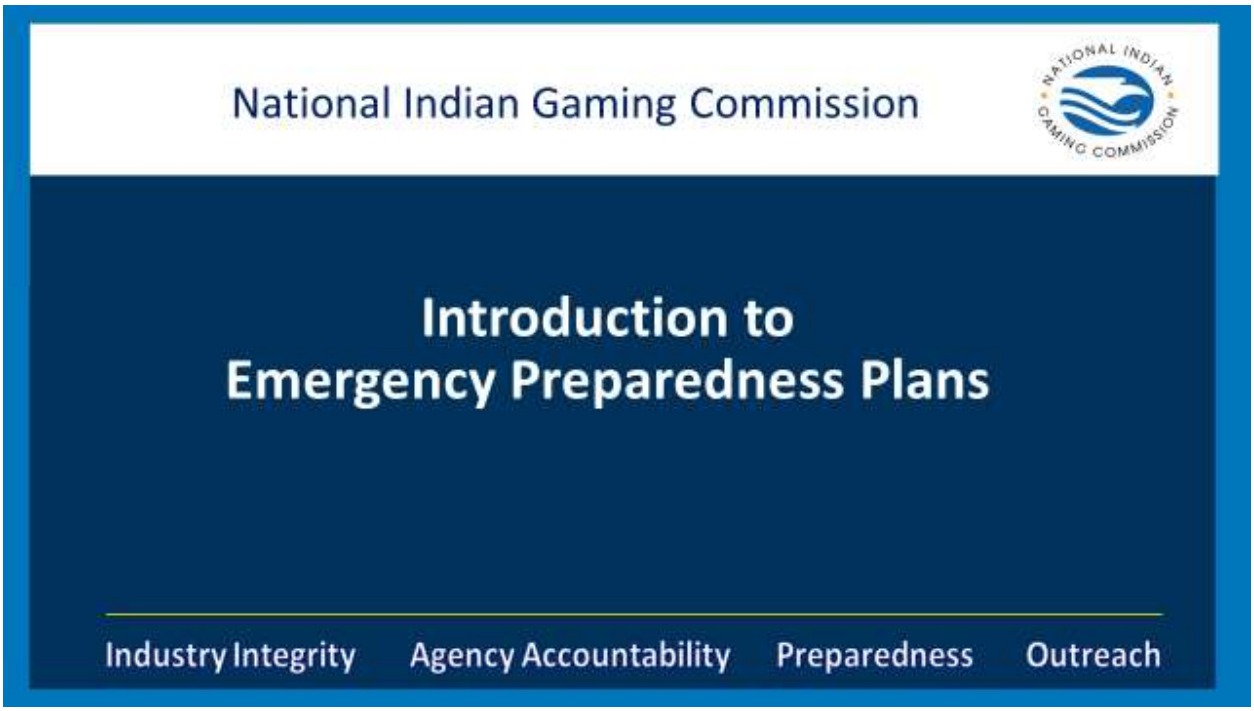
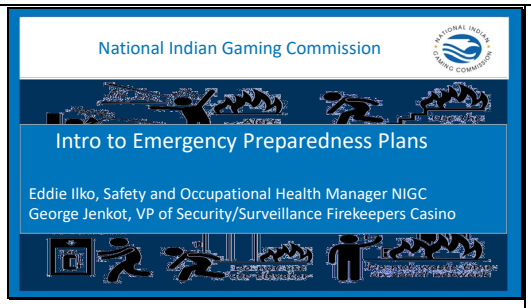
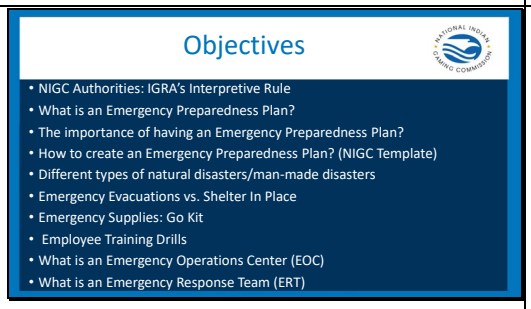
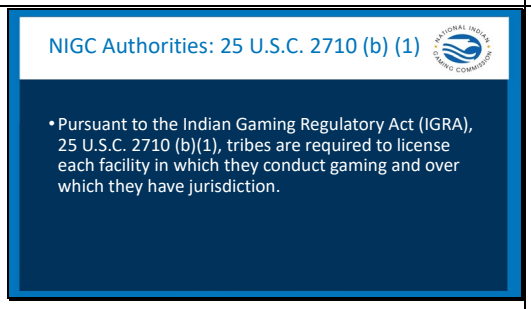
Note Pages

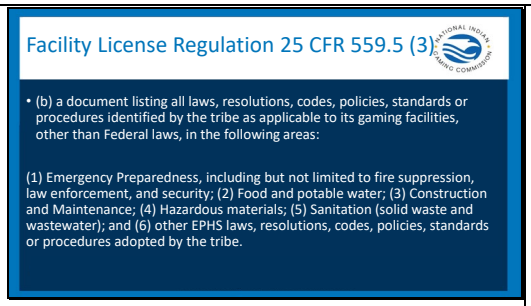
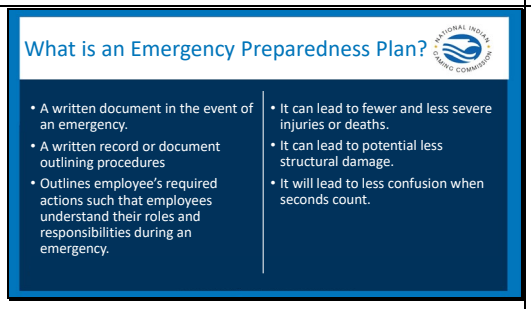
Introduction to Emergency Preparedness Plans

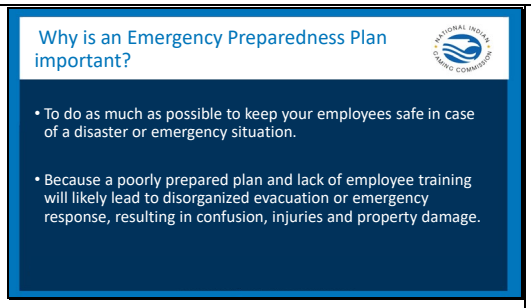
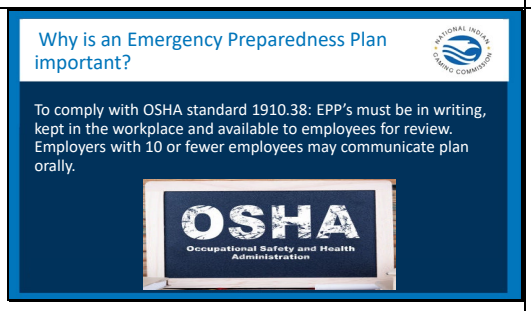


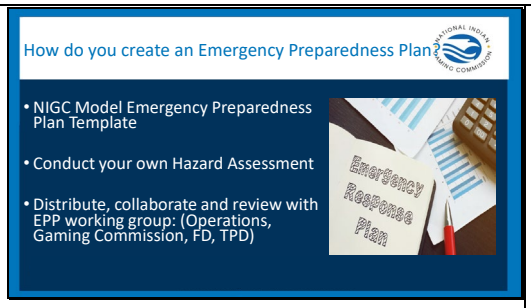
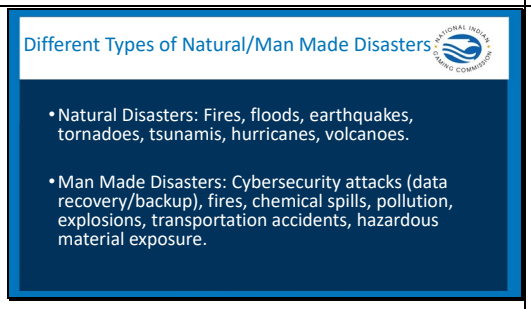
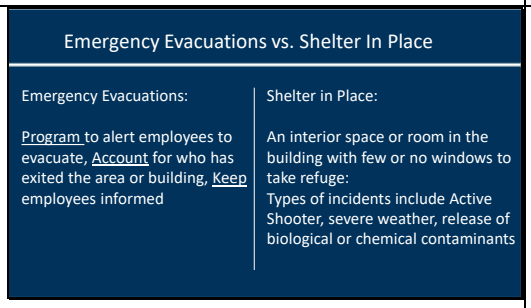
Intro to Emergency Preparedness Plans Participant Guide

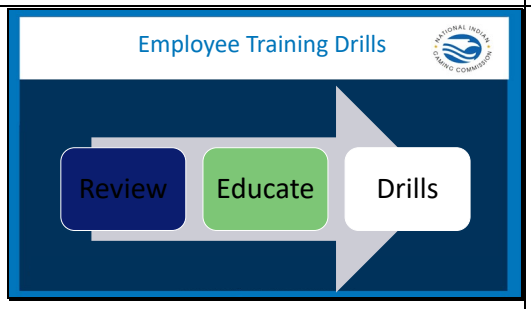
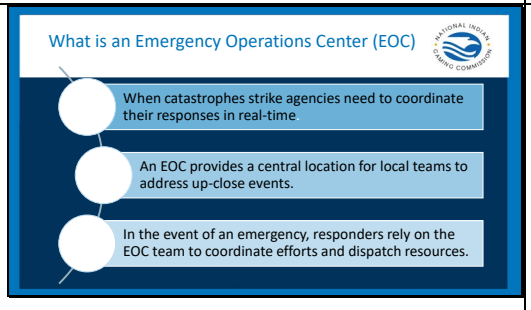
Slide 1		
Slide 2		**Key Points:** What is an Emergency Preparedness Plan? Why is it important to have an Emergency Preparedness Plan? How to create an Emergency Preparedness Plan? (NIGC Template) Different types of natural disasters/man-made disaster Emergency Evacuations vs. Shelter In Place Emergency Supplies: Go Kit Employee Training Drills What is an Emergency Operations Center (EOC) What is an Emergency Response Team (ERT)

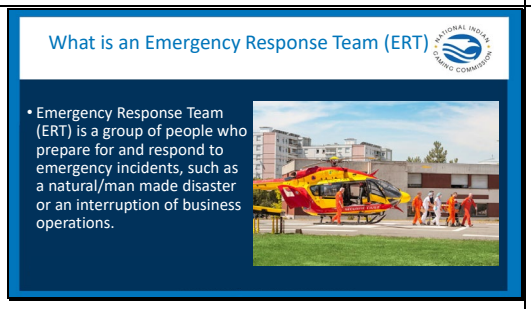
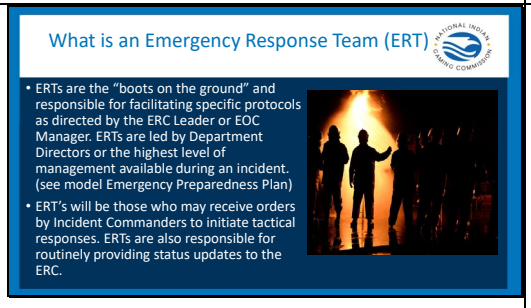
Slide 3		
Slide 4		**Key Points:** Part 559 addresses this section of IGRA by governing the process by which tribes must notify the NIGC when they are considering issuing a facility license; when a facility license is terminated; and when a facility license is renewed.
Slide 5		**Key Points:** This means that a tribe has identified and enforces laws, resolutions, codes, policies, standards or procedures applicable to each gaming place, facility, or location that protect the environment and the public health and safety, including standards, under a tribal-state compact or Secretarial procedures".

Slide 6		
Slide 7		**Key Points:** Understanding the definition of EPP and its applicability. A written document to facilitate and organize employers and employees in the event of an emergency. A written record or document outlining procedures and steps to take during emergencies, and the ability to refresh knowledge of procedures and steps. Outlines employee's required actions such that employees understand their roles and responsibilities during an emergency. It can lead to fewer and less severe injuries or deaths. It can lead to potential less structural damage. It will lead to less confusion when seconds count.

Slide 8		**Key Points:** To do as much as possible to keep your employees safe in case of a disaster or emergency situation. Because a poorly prepared plan and lack of employee training will likely lead to disorganized evacuation or emergency response, resulting in confusion, injuries and property damage. To comply with OSHA standard 1910.38: EAP's must be in writing, kept in the workplace and available to employees for review. Employers with 10 or fewer employees may communicate plan orally.
Slide 9		**Key Points:** To comply with OSHA standard 1910.38: EAP's must be in writing, kept in the workplace and available to employees for review. Employers with 10 or fewer employees may communicate plan orally.

Slide 10		**Key Points:** NIGC Emergency Preparedness Plan Template (available on NIGC website) NIGC Emergency Preparedness Plan Template Conduct your own Hazard Assessment Distribute, collaborate and review with EPP working group: (Operations, Gaming Commission, FD, TPD)
Slide 11		**Key Points:** Natural Disasters: Fires, floods, earthquakes, tornadoes, tsunamis, hurricanes, volcanoes Man Made Disasters: Cyber Security attacks (data recovery/backup), fires, chemical spills, pollution, explosions, transportation accidents, hazardous material exposure
Slide 12		**Key Points:** Emergency Evacuations: Program to alert employees to evacuate, Account for who has exited the area or building, Keep employees informed Shelter in Place: An interior space or room in the building with few or no windows to take refuge: Types of incidents include Active Shooter, severe weather, release of biological or chemical contaminants

Slide 13		**Key Points:** Emergency Food and Water Medical and First-Aid Supplies (1st Aid Kits, AED's, cold compresses, portable oxygen) Flashlights, radios, batteries, glow sticks, emergency kits or backpacks Blankets, backboards Wheelchairs or other mobility devices
Slide 14		**Key Points:** Review EPP with every employee upon initial job assignment Educate and Train Annual vs. Quarterly Drills Provide annual refresher training with practice drills, practice evacuations and gatherings at assembly areas Non-disruptive to gaming operations/patrons
Slide 15		**Key Points:** An Emergency Operations Center is a secure location that provides for centralized monitoring, control, and command of an emergency event. When catastrophes strike agencies need to coordinate their responses in real-time. An EOC provides a central location for local teams to address up-close events. In the event of an emergency, responders rely on the EOC team to

		coordinate efforts and dispatch resources.
Slide 16		**Key Points:** Emergency Response Team (ERT) is a group of people who prepare for and respond to emergency incidents, such as a natural disaster or an interruption of business operations. Incident emergency response teams are common in public service organizations as well as businesses. The team is generally composed of specific members designated before an incident occurs and trained to respond to emergencies.
Slide 17		

Slide 18		**Key Points:** Thank you for attending "Introduction to Emergency Plans". If you have any questions or comments please send them to TRAININGINFO@nigc.gov
Slide 19		
Slide 20		

NIGC National Training Conference Evaluation

Course Name: Introduction to Emergency Preparedness Plans

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Presentations and materials are clear.					
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Was the presenter(s) knowledgeable in the subject matter?					
Overall, I would rate the presenter(s):					

Please provide additional details relevant to your scores above.

How do you feel NIGC can improve for future trainings?

Please list any recommendations for future training topics.

Note Pages

Government Agency Panel Discussion

NIGC National Training Conference Evaluation

Course Name: Government Agency Panel Discussion

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Note Pages

Collaborative Approach to Combatting Human Trafficking

NIGC National Training Conference Evaluation

Course Name: Collaborative Approach to Combatting Human Trafficking

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