

# Cage, Vault, Kiosk, Cash and Cash Equivalents 25 CFR 543.18 Toolkit

Version 1.0

Division of Public Affairs



## NIGC Cage, Vault, Kiosk, Cash, and Cash Equivalents—25 CFR 543.18 Toolkit

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

The NIGC is pleased to present this Toolkit to all Compliance and Auditing staff. This reference guide is intended to assist Auditors, Gaming Commissioners, and Operations' personnel in the performance of measuring compliance of their operation(s) with 25 CFR 543.18. The Toolkit is designed to provide each standard of 543.18, the intent of the standard, and a *recommended* testing step, which will ensure minimum regulatory compliance.

This Toolkit is designed to meet the minimum requirements of the NIGC Minimum Internal Control Standards (MICS) and does not take into account Operations' Tribal Internal Control Standards (TICS) and/or System of Internal Control Standards (SICS), which may require further testing. The NIGC encourages Operations to develop standards that exceed the MICS because each Operation is unique, therefore a robust set of controls is warranted.

If you have questions or comments about this guide, please contact the NIGC Division of Public Affairs at [traininginfo@nigc.gov](mailto:traininginfo@nigc.gov). For more information, visit the NIGC website at <http://www.nigc.gov>.

## How to use this Toolkit

The Training Department has designed this Toolkit as a resource for understanding the Cage, Vault, Kiosk, Cash and Cash Equivalents 543.18 Minimum Internal Control Standards (MICS) and to use as a tool in conducting an audit of the revenue standards of all gaming departments in determining compliance with 543.18. This Toolkit table can help:

- 1) Clarify the meaning of terms used in this Toolkit (Definitions);
- 2) See the regulation for Cage, Vault, Kiosk, Cash and Cash Equivalent 543.18. (The regulation is listed in the first column of the table verbatim);
- 3) Understand the intent of the regulation and why the control was created. (The intent is listed in the second column of the table);
- 4) Determine testing steps to determine compliance with the regulation. (The testing step is listed in the second column of the table under the intent information);
- 5) Identify best practices. (These have been included in either the intent or testing steps to provide the user with current industry procedures); and
- 6) Additional information is provided as a Note. This information provides practical advice to consider when performing the testing step, such as the step being completed in another section.

The Toolkit provides many practical and concrete suggestions for understanding and evaluating compliance with 543.18. This Toolkit can be used by either the new or experienced auditor during various stages of the audit.

GLOSSARY	DEFINITION
<b>Accountability</b>	All financial instruments, receivables, and patron deposits constituting the total amount for which the bankroll custodian is responsible at a given time.
<b>Agent</b>	A person authorized by the gaming operation, as approved by the TGRA, to make decisions or perform assigned tasks or actions on behalf of the gaming operation.
<b>Automated payout</b>	Payment issued by a gaming machine, commonly referred to as payout slips, vouchers, or tickets.
<b>Cage</b>	A secure work area within the gaming operation for cashiers, which may include a storage area for the gaming operation bankroll.

<b>Cash equivalents</b>	Documents, financial instruments other than cash, or anything else of representative value to which the gaming operation has assigned a monetary value. A cash equivalent includes, but is not limited to, tokens, chips, coupons, vouchers, payout slips and tickets, and other items to which a gaming operation has assigned an exchange value.
<b>Cashless System</b>	A system that performs cashless transactions and maintains records of those cashless transactions.
<b>Class II gaming</b>	Games of chance such as bingo (whether or not electronic, computer, or other technological aids are used in connection therewith in), pull tabs, and non-banked card games (poker).
<b>Class II gaming system</b>	All components, whether or not technologic aids in electronic, computer, mechanical, or other technologic form, that function together to aid the play of one or more Class II games, including accounting functions mandated by these regulations or part 547 of this chapter.

<b>Counter Check</b>	A form (similar to a marker form) provided by the Gaming Operation that is completed as is necessary for the instrument to be presented to the patron's bank for payment.
<b>Independent</b>	The separation of functions to ensure that the agent or process monitoring, reviewing, or authorizing the controlled activity, function, or transaction is separate from the agents or process performing the controlled activity, function, or transaction.
<b>Kiosk</b>	A device capable of redeeming vouchers and/or wagering credits or initiating electronic transfers of money to or from a patron deposit account.
<b>Manual payout</b>	Any non-automated payout.

<b>MICS</b>	Minimum internal control standards in this part.
<b>Patron</b>	A person who is a customer or guest of the gaming operation and may interact with a Class II game. Also may be referred to as a "player".
<b>Player interface</b>	Any component(s) of a Class II gaming system, including an electronic or technologic aid (not limited to terminals, player stations, handhelds, fixed units, etc.), that directly enables player interaction in a Class II game.
<b>Prize payout</b>	Payment to a player associated with a winning or qualifying event.

<b>Sample</b>	A set of records, data, or elements drawn from a larger population and analyzed to estimate the characteristics of that population.
<b>Shift</b>	A time period, unless otherwise approved by the tribal gaming regulatory authority, not to exceed 24 hours.
<b>SICS (System of Internal Control Standards)</b>	An overall operational framework for a gaming operation that incorporates principles of independence and segregation of function, and is comprised of written policies, procedures, and standard practices based on overarching regulatory standards specifically designed to create a system of checks and balances to safeguard the integrity of a gaming operation and protect its assets from unauthorized access, misappropriation, forgery, theft, or fraud.
<b>Tier A</b>	Gaming operations with annual gross gaming revenues of more than \$3 million but not more than \$8 million.



<b>Tier B</b>	Gaming operations with annual gross gaming revenues of more than \$8 million but not more than \$15 million.
<b>Tier C</b>	Gaming operations with annual gross gaming revenues of more than \$15 million.
<b>TGRA</b>	Tribal gaming regulatory authority, which is the entity authorized by tribal law to regulate gaming conducted pursuant to the Indian Gaming Regulatory Act.
<b>TICS</b>	Tribal Internal Control Standards established by the TGRA that are at least as stringent as the standards set forth in this part.

<b>Vault</b>	A secure area where cash and cash equivalents are stored.
<b>Voucher</b>	A financial instrument of fixed waging value, usually paper, that can be used only to acquire an equivalent value of cashable credits or cash through interaction with a voucher system.

<u>Citation</u>	<u>Language</u>	<u>Intent and Testing</u>
<b>§ 543.18(a)</b>		
543.18(a)	<p><i>Supervision.</i> Supervision must be provided as needed for cage, vault, kiosk, and other operations using cash or cash equivalents by an agent(s) with authority equal to or greater than those being supervised.</p>	<p><b>Intent:</b> To provide for the proper supervision of cage, vault, kiosk, and other operations using cash or cash equivalents, which may include monitoring work, providing training, scheduling staff, and other supervisory functions.</p> <p><b>Testing:</b></p> <ol style="list-style-type: none"> <li>1. Review organizational chart, department schedules, and/or job descriptions for personnel who perform and supervise cage operations to determine the structure of supervision for revenue audit.</li> <li>2. Observe supervision of the performance of cage operations to verify proper supervision is provided.</li> <li>3. Inquire with supervisory personnel to determine what types of tasks are performed as part of the supervision of the cage, such as monitoring staff, scheduling, providing training, etc. Further inquiries may be needed based on what is verified by reviews and observations from testing #1 and #2.</li> </ol>

**§ 543.18(b)(1)(i-iv)**

<p>543.18(b)(1)(i-iv)</p>	<p><i>Check cashing.</i></p> <p>(1) If checks are cashed at the cage, the controls must provide for security and integrity. For each check cashing transaction, the agent(s) conducting the transaction must:</p> <p>(i) Verify the patron’s identity;</p> <p>(ii) Examine the check to ensure it includes the patron’s name, current address, and signature;</p> <p>(iii) For personal checks, verify the patron’s check cashing authority and record the source and results in accordance with management policy; however</p> <p>(iv) If a check guarantee service is used to guarantee the transaction and the procedures required by the check guarantee service are followed, then the above requirements do not apply.</p>	<p><b>Intent:</b> To provide for the protection of assets and control for the security and integrity of the acceptance of checks by the Gaming Operation.</p> <p><b>Testing:</b></p> <ol style="list-style-type: none"> <li>1. Review TICS and/or SICS to determine what controls are established to provide security and integrity for cashing of checks and determine whether the operation utilizes a check guarantee service.</li> <li>2. If a third-party check guarantee service is used, inquire with cage personnel whether any checks are allowed to be cashed outside of (not utilizing) the guarantee service. <b>Note:</b> These standards apply for any checks cashed outside of a guarantee service.</li> <li>3. Observe check cashing procedures to verify the cashier: confirms the patron’s identity; examines the check to ensure it includes the patron’s name, current address, and signature; reviews the patron’s check cashing authority and documents results in accordance with policy, for personnel checks; and follows any other requirements established in the operation’s controls.</li> </ol>
---------------------------	--	---

**§ 543.18(b)(2)(i-v)**

<p>543.18(b)(2)(i-v)</p>	<p><i>Check cashing.</i></p> <p>(2) When counter checks are issued, the following must be included on the check:</p>	<p><b>Intent:</b> To provide for the protection of assets and require specific information be recorded on counter checks issued by the Gaming Operation so the instrument can be presented to the patron’s bank for payment.</p>
--------------------------	--	--

	<p>(i) The patron’s name and signature;</p> <p>(ii) The dollar amount of the counter check;</p> <p>(iii) Patron’s bank name, bank routing and account numbers;</p> <p>(iv) Date of issuance; and</p> <p>(v) Signature of the agent approving the counter check transaction.</p>	<p><b>Testing:</b></p> <ol style="list-style-type: none"> <li>1. Inquire with cage personnel if the operation issues counter checks. If counter checks are not issued, these standards do not apply. <b>Note:</b> The issuance of counter checks has become very rare, particularly if the operation does not also offer marker credit.</li> <li>2. Observe procedures for the issuance of counter checks and examine issued counter check(s) from cage cashier’s drawer to verify the counter check includes: the patron’s name and signature; the dollar amount; the patron’s bank name, routing number, and account number; date of issue; and signature for approval of the counter check issuance.</li> </ol>
<p><b>§ 543.18(b)(3-5)</b></p>		
<p>543.18(b)(3)</p>	<p><i>Check cashing.</i></p> <p>(3) Checks that are not deposited in the normal course of business, as established by management, (held checks) are subject to §543.15 lines of credit standards.</p>	<p><b>Intent:</b> To provide for the protection of assets and require adherence to §543.15 if checks are not promptly deposited.</p> <p><b>Testing:</b></p> <ol style="list-style-type: none"> <li>1. Review TICS and/or SICS to determine whether any cashed checks are held and not deposited in the normal course of business.</li> <li>2. Inquire with cage and vault personnel to determine whether any cashed checks are held and not deposited in the normal course of business.</li> <li>3. Review cage paperwork and/or general ledger for any indication of “held” checks.</li> </ol>

		<p>4. If any checks are not deposited in the normal course of business, perform testing for §543.15 lines of credit standards.</p>
543.18(b)(4)	<p><i>Check cashing.</i></p> <p>(4) When traveler’s checks or other guaranteed drafts, such as cashier’s checks, are presented, the cashier must comply with the examination and documentation procedures required by the issuer.</p>	<p><b>Intent:</b> To provide for the protection of assets and require adherence to procedures from the issuer of traveler’s checks and guaranteed drafts.</p> <p><b>Testing:</b></p> <ol style="list-style-type: none"> <li>1. Review TICS and/or SICS and inquire with cage personnel to determine whether traveler’s checks and/or other guaranteed drafts (e.g., money orders, cashier’s checks, etc.) are cashed at the cage.</li> <li>2. For the instruments accepted, observe procedures for cashing these instruments to verify examination and documentation procedures, as required by the instrument or available issuer’s guidelines/procedures, are followed. If observation is not possible due to low frequency of transactions, inquire with cage personnel to confirm compliance with required procedures.</li> </ol>
543.18(b)(5)	<p><i>Check cashing.</i></p> <p>(5) If a third party check cashing or guarantee service is used, the examination and documentation procedures required by the service provider apply, unless otherwise provided by tribal law or regulation.</p>	<p><b>Intent:</b> To provide for the protection of assets and require adherence to procedures from third-party check guarantee services.</p> <p><b>Testing:</b></p> <ol style="list-style-type: none"> <li>1. Review TICS and/or SICS and inquire with cage personnel to determine whether the operation uses a third-party check cashing guarantee service. <b>Note:</b> if the operation</li> </ol>

		<p>does not utilize a third-party service, this standard does not apply.</p> <ol style="list-style-type: none"> <li>2. Review contract, agreement, and/or procedures required by the third-party vendor for their guarantee of cashed checks.</li> <li>3. Observe check cashing procedures to verify the examination and documentation procedures required by the third-party provider are followed.</li> <li>4. Inquire with cage and/or accounting personnel to determine whether any returned checks were not guaranteed by the provider due to failure to follow required procedures Review supporting documentation for such instances if they occurred to determine procedures not followed.</li> </ol>
<b>§ 543.18(c)</b>		
543.18(c)(1)	<p><i>Cage and vault accountability.</i></p> <p>(1) All transactions that flow through the cage must be summarized for each work shift of the cage and must be supported by documentation.</p>	<p><b>Intent:</b> To provide for the protection of assets and ensure accountability of cage transactions and inventory by shift.</p> <p><b>Testing:</b></p> <ol style="list-style-type: none"> <li>1. For the selected test period, examine cage count summaries (count sheets, accountability, inventory) and supporting documentation. Trace supporting documentation to count summaries to confirm cage inventory is properly supported for each shift.</li> </ol>

<p>543.18(c)(2)</p>	<p><i>Cage and vault accountability.</i></p> <p>(2) Increases and decreases to the total cage inventory must be verified, supported by documentation, and recorded. Documentation must include the date and shift, the purpose of the increase/decrease, the agent(s) completing the transaction, and the person or department receiving the cage funds (for decreases only).</p>	<p><b>Intent:</b> To provide for the protection of assets and ensure accountability of cage inventories.</p> <p><b>Testing:</b></p> <ol style="list-style-type: none"> <li>1. For the selected test period, examine supporting documentation for increases and decreases to the cage inventory to verify documentation includes date and shift, purpose/reason, identification of the personnel completing the transaction(s), and the personnel receiving cage funds (for decreases).</li> </ol>
<p>543.18(c)(3)</p>	<p><i>Cage and vault accountability.</i></p> <p>(3) The cage and vault inventories (including coin rooms) must be counted independently by at least two agents, attested to by signature, and recorded in ink or other permanent form at the end of each shift during which the activity took place. These agents must make individual counts to compare for accuracy and maintain individual accountability. All variances must be documented and investigated.</p>	<p><b>Intent:</b> To provide for the protection of assets and ensure accountability of cage and vault inventories.</p> <p><b>Testing:</b></p> <ol style="list-style-type: none"> <li>1. Observe shift change inventory count(s) to confirm cage and vault inventories are counted independently by at least two persons and that each person performing the count(s) does not have prior knowledge of the amounts counted. <b>Note:</b> the standard requires at least two active independent counts, one person performing a count and another person only observing the count does not satisfy this standard.</li> <li>2. Review documentation for counts to confirm documentation is signed by personnel performing the independent counts and counts are recorded in ink or other permanent form.</li> <li>3. If any variances between the independent counts occur, verify they the variance is resolved either through a</li> </ol>



		matching recount of funds or an investigation determining the cause of the discrepancy.
543.18(c)(4)	<p><i>Cage and vault accountability.</i></p> <p>(4) The gaming operation must establish and comply with a minimum bankroll formula to ensure the gaming operation maintains cash or cash equivalents (on hand and in the bank, if readily accessible) in an amount sufficient to satisfy obligations to the gaming operation's patrons as they are incurred.</p>	<p><b>Intent:</b> To safeguard the integrity of the gaming operation by ensuring that it is able to meet its obligations to patrons.</p> <p><b>Testing:</b></p> <ol style="list-style-type: none"> <li>1. Review TICS and/or SICS to determine the established minimum bankroll formula.</li> <li>2. For the selected test period, review documentation for the calculation of the minimum bankroll formula and supporting documentation. Verify the calculation was performed properly by recalculating the formula and confirming the correct numbers were used for the calculation.</li> <li>3. Verify that the gaming operation maintains cash or cash equivalents readily accessible in the amount determined by the minimum bankroll formula.</li> </ol>
<b>§ 543.18(d)</b>		
543.18(d)(1)	<p><i>Kiosks.</i></p> <p>(1) Kiosks must be maintained on the cage accountability and must be counted independently by at least two agents,</p>	<p><b>Intent:</b> To provide for the protection of assets and ensure accountability of kiosks as part of the cage's inventory.</p> <p><b>Testing:</b></p> <ol style="list-style-type: none"> <li>1. Observe count for kiosks to confirm kiosk funds are counted independently by at least two persons and that</li> </ol>

	documented, and reconciled for each increase or decrease to the kiosk inventory.	<p>each person performing the count(s) does not have prior knowledge of the amounts counted. <b>Note:</b> the standard requires at least two active independent counts, one person performing a count and another person only observing the count does not satisfy this standard.</p> <p><b>2.</b> For the selected test period, examine kiosk reconciliation documentation (kiosk count documentation, cage inventory documentation, etc.) to verify increases and decreases of kiosk inventory is reconciled to the cage inventory and maintained on the cage’s accountability.</p>
543.18(d)(2)	<p><i>Kiosks.</i></p> <p>(2) Currency cassettes must be counted and filled by an agent and verified independently by at least one agent, all of who must sign each cassette.</p>	<p><b>Intent:</b> To provide for the protection of assets and accountability for the count and filling of kiosk cassettes.</p> <p><b>Testing:</b></p> <ol style="list-style-type: none"> <li><b>1.</b> Observe count and filling of kiosk cassettes to confirm funds are counted and independently verified by at least two separate personnel.</li> <li><b>2.</b> Review documentation of count and independent verification to ensure each person signed for accountability of the count and verification for each cassette.</li> </ol>
543.18(d)(3)	<p><i>Kiosks.</i></p> <p>(3) Currency cassettes must be secured with a lock or tamper resistant seal and, if not placed</p>	<p><b>Intent:</b> To provide for the protection of assets and security of currency cassettes for kiosks.</p> <p><b>Testing:</b></p>

	inside a kiosk, must be stored in a secured area of the cage/vault.	<ol style="list-style-type: none"> <li>1. Observe cassettes for kiosks to ensure each cassette is secured by a lock or tamper resistant seal and stored cassettes are in a secured area of the cage/vault.</li> </ol>
543.18(d)(4)	<p><i>Kiosks.</i></p> <p>(4) The TGRA or the gaming operation, subject to approval of the TGRA, must develop and implement physical security controls over the kiosks. Controls should address the following: forced entry, evidence of any entry, and protection of circuit boards containing programs.</p>	<p><b>Intent:</b> To provide for the protection of assets and controls for the security of kiosks.</p> <p><b>Testing:</b></p> <ol style="list-style-type: none"> <li>1. Review TICS and/or SICS to determine the controls established for the physical security of kiosks and the controls address forced entry, evidence of entry, and protection of program circuit boards.</li> <li>2. Observe kiosks to confirm the established physical security controls are in place.</li> </ol>
543.18(d)(5)	<p><i>Kiosks.</i></p> <p>(5) With regard to cashless systems, the TGRA or the gaming operation, subject to the approval of the TGRA, must develop and implement procedures to ensure that communications between the kiosk and system are secure and functioning.</p>	<p><b>Intent:</b> To provide for the protection of assets and procedures for communication between kiosks and cashless systems.</p> <p><b>Testing:</b></p> <ol style="list-style-type: none"> <li>1. Review TICS and/or SICS to determine the controls established to ensure communication between kiosk(s) and the cashless wagering system is secure and functioning properly.</li> <li>2. Inquire with cage personnel to determine whether the operation uses a cashless system for wagering (e.g., Patron Player Account). If the operation does not use a cashless system, this standard does not apply.</li> </ol>

		<p>3. Observe, inquire with operational personnel, and review supporting documentation as needed to confirm procedures are performed as required by the controls.</p>
<p>543.18(d)(6)(i-xii)</p>	<p><i>Kiosks.</i></p> <p>(6) The following reconciliation reports must be available upon demand for each day, shift, and drop cycle (this is not required if the system does not track the information, but system limitation(s) must be noted):</p> <p>(i) Starting balance dollar amount per financial instrument;</p> <p>(ii) Starting balance number of items per financial instrument;</p> <p>(iii) Dollar amount per financial instrument issued;</p> <p>(iv) Number of items per financial instrument issued;</p> <p>(v) Dollar amount per financial instrument redeemed;</p> <p>(vi) Number of items per financial instrument redeemed;</p>	<p><b>Intent:</b> To provide for the protection of assets and availability of reports to perform kiosk count reconciliations.</p> <p><b>Testing:</b></p> <ol style="list-style-type: none"> <li>1. Review TICS and/or SICS and inquire with cage personnel to determine whether any system limitations are noted for the availability of any of the required information from the kiosk reconciliation reports.</li> <li>2. For the selected test period, examine kiosk reconciliation reports to confirm the required information is available upon demand for each day, shift, and drop period from the kiosk system. If any information is not tracked by the system, confirm the limitation is noted.</li> </ol>

	<p>(vii) Dollar amount per financial instrument increases;</p> <p>(viii) Number of items per financial instrument increases;</p> <p>(ix) Dollar amount per financial instrument decreases;</p> <p>(x) Number of items per financial instrument decreases;</p> <p>(xi) Ending balance dollar amount per financial instrument; and</p> <p>(xii) Ending balance number of items per financial instrument.</p>	
<b>§ 543.18(e)</b>		
543.18(e)(1)	<p><i>Patron deposited funds.</i> If a gaming operation permits a patron to deposit funds with the gaming operation at the cage, and when transfers of patron deposited funds are transferred to a gaming area for wagering purposes, the following standards apply:</p> <p>(1) The receipt or withdrawal of a patron deposit must be documented, with a copy given to the patron and a copy remaining in the cage.</p>	<p><b>Intent:</b> To provide for the protection of assets and accountability of patron deposited funds.</p> <p><b>Testing:</b></p> <ol style="list-style-type: none"> <li>1. Perform observation of receipt and withdrawal of patron deposited funds to confirm a copy of the transaction documentation is provided to the patron and a copy remains in the cage.</li> <li>2. Review documentation for observed receipt and withdrawal transactions to confirm transaction activity was accurately documented.</li> </ol>

543.18(e)(2)(i-vi)	<p><i>Patron deposited funds.</i> If a gaming operation permits a patron to deposit funds with the gaming operation at the cage, and when transfers of patron deposited funds are transferred to a gaming area for wagering purposes, the following standards apply:</p> <p>(2) Both copies of the document of receipt or withdrawal must contain the following information:</p> <p>(i) Same receipt number on each copy;</p> <p>(ii) Patron’s name and signature;</p> <p>(iii) Date of receipt and withdrawal;</p> <p>(iv) Dollar amount of deposit/withdrawal (for foreign currency transactions include the US dollar equivalent, the name of the foreign country, and the amount of the foreign currency by denomination);</p> <p>(v) Nature of deposit/withdrawal; and</p> <p>(vi) Name and signature of the agent who conducted the transaction.</p>	<p><b>Intent:</b> To provide for the protection of assets and accountability of patron deposited funds.</p> <p><b>Testing:</b></p> <ol style="list-style-type: none"> <li>1. Review documentation for observation completed in 543.18(e)(1) of the receipt and withdrawal transactions to confirm both copies include the same receipt number, patron’s name and signature, date of transaction, dollar amount of transaction, nature of deposit/withdrawal, and name and signature of cage personnel performing the transaction. Note: for transactions in foreign currency, the documentation should include U.S dollar equivalent, name of the foreign country, and amount of foreign currency by denomination. It is recommended that the exchange rate at the date of the transaction also be documented.</li> </ol>

543.18(e)(3)(i-iii)	<p><i>Patron deposited funds.</i> If a gaming operation permits a patron to deposit funds with the gaming operation at the cage, and when transfers of patron deposited funds are transferred to a gaming area for wagering purposes, the following standards apply:</p> <p>(3) Procedures must be established and complied with for front money deposits to:</p> <p>(i) Maintain a detailed record by patron name and date of all funds on deposit;</p> <p>(ii) Maintain a current balance of all patron deposits that are in the cage/vault inventory or accountability; and</p> <p>(iii) Reconcile the current balance with the deposits and withdrawals at least daily.</p>	<p><b>Intent:</b> To provide for the protection of assets and accountability of patron deposited funds.</p> <p><b>Testing:</b></p> <ol style="list-style-type: none"> <li>1. Review TICS and/or SICS to determine what procedures are established for front money deposits.</li> <li>2. Review current documentation for front money deposits; confirm records by patron name and date including the current balance of all patron deposits in the cage/vault accountability are maintained. In addition, confirm that a reconciliation of the current balance of all patron deposits in the cage/vault accountability with the deposit and withdrawal transactions is performed at least daily.</li> </ol>
<b>§ 543.18(f)</b>		
543.18(f)(1),(2)(i-v)	<p><i>Promotional payments, drawings, and giveaway programs.</i> The following procedures must apply to any payment resulting from a promotional payment, drawing, or giveaway program disbursed by the cage department or any other department. This section does not apply to payouts for card game promotional pots and/or pools.</p>	<p><b>Intent:</b> To provide for the protection of assets and help ensure the integrity of promotional activity.</p> <p><b>Testing:</b></p> <ol style="list-style-type: none"> <li>1. For the selected test period, review payout documentation (related to promotional payments, drawings, and giveaway programs) and cage accountability documentation to confirm promotional payments are supported by documentation.</li> </ol>

	<p>(1) All payments must be documented to support the cage accountability.</p> <p>(2) Payments above \$600 (or lesser amount as approved by TGRA) must be documented at the time of the payment, and documentation must include the following:</p> <p>(i) Date and time;</p> <p>(ii) Dollar amount of payment or description of personal property;</p> <p>(iii) Reason for payment; and</p> <p>(iv) Patron’s name and confirmation that identity was verified (drawings only).</p> <p>(v) Signature(s) of at least two agents verifying, authorizing, and completing the promotional payment with the patron. For computerized systems that validate and print the dollar amount of the payment on a computer generated form, only one signature is required.</p>	<p>2. For payments above \$600 (or a lesser approved threshold), review payout documentation to confirm that it contains: the date and time; dollar amount or description of property; reason for payment; patron’s name and ID confirmation (for drawings only); and signature of at least two personnel verifying, authorizing, and completing the payment are documented. Note: Only one signature is required if a computerized system is utilized to validate and print the amount of the promotional payment.</p>
<b>§ 543.18(g)</b>		
543.18(g)(1-5)	<p><i>Chip(s) and tokens.</i> Controls must be established and procedures implemented to ensure accountability of chip and token inventory. Such</p>	<p><b>Intent:</b> To provide for the protection of assets and accountability of chips and tokens.</p> <p><b>Testing:</b></p>



	<p>controls must include, but are not limited to, the following:</p> <ul style="list-style-type: none"> <li>(1) Purchase;</li> <li>(2) Receipt;</li> <li>(3) Inventory;</li> <li>(4) Storage; and</li> <li>(5) Destruction.</li> </ul>	<ul style="list-style-type: none"> <li>1. Review TICS and/or SICS to determine what controls and procedures are established for accountability of chips and tokens, including purchases, receipt, inventory, storage, and destruction.</li> <li>2. For the selected test period, review supporting documentation for chip and token purchases, receipts, inventories, storage, and destructions, and cage/vault accountability documentation to confirm chips and tokens are properly accounted for in accordance with established controls and procedures.</li> </ul>
<b>§ 543.24 18(h)</b>		
543.18(h)(1)(i-v)	<p><i>Vouchers.</i></p> <ul style="list-style-type: none"> <li>(1) Controls must be established and procedures implemented to: <ul style="list-style-type: none"> <li>(i) Verify the authenticity of each voucher redeemed.</li> <li>(ii) If the voucher is valid, verify that the patron is paid the appropriate amount.</li> <li>(iii) Document the payment of a claim on a voucher that is not physically available or a voucher that cannot be validated such as a mutilated, expired, lost, or stolen voucher.</li> </ul> </li> </ul>	<p><b>Intent:</b> To prevent potential misappropriation of assets by establishing and implementing procedures for the redemption of vouchers which include verifying the voucher in the validation system, verifying patron is paid appropriately, documenting payment of vouchers which cannot be validated (printer errors, expired (if honored), etc.), retaining voucher for reconciliation and supervisory verification for payouts over \$500 when the system is down.</p> <p><b>Testing:</b></p> <ul style="list-style-type: none"> <li>1. Review TICS to ensure controls are established and review SICS to determine the procedures for verifying authenticity, payment of mutilates, expired, lost, stolen vouchers, and manual payments of vouchers.</li> <li>2. Interview appropriate personnel to verify actual procedure (Cage management, Cage cashier)</li> </ul>

	<p>(iv) Retain payment documentation for reconciliation purposes.</p> <p>(v) For manual payment of a voucher of \$500 or more, require a supervisory employee to verify the validity of the voucher prior to payment.</p>	<ol style="list-style-type: none"> <li>3. Review sample of vouchers redeemed and manual vouchers redeemed including those in the cashier’s drawer to verify the payment is documented Review sample of reports from validation system to confirm supervisory verification. (Look at sample as defined in the Glossary) <i>(Note: Manual payouts exist when the system is down.)</i></li> <li>4. Observation of a voucher redemption paid by an employee (e.g., cage, slot booth, etc.) either live or through surveillance coverage.</li> </ol>
543.18(h)(2)	<p><i>Vouchers.</i></p> <p>(2) Vouchers paid during a period while the voucher system is temporarily out of operation must be marked “paid” by the cashier.</p>	<p><b>Intent:</b> To prevent misappropriation of assets by ensuring a voucher redeemed while the validation system is out of operation is properly marked as paid so it cannot be redeemed again.</p> <p><b>Testing:</b></p> <ol style="list-style-type: none"> <li>1. Review TICS and or SICS to determine the procedure for paying vouchers when the voucher system is down.</li> <li>2. If no sample can be located, interview appropriate personnel to verify procedure (e.g., Cage Cashier, Floor Cashier)</li> <li>3. Review sample of vouchers paid while the system is down. (Look at sample as defined in the Glossary)</li> </ol>

<p>543.18(h)(3)</p>	<p><i>Vouchers.</i></p> <p>(3) Vouchers redeemed while the voucher system was temporarily out of operation must be validated as expeditiously as possible upon restored operation of the voucher system.</p>	<p><b>Intent:</b> To prevent potential misappropriation of assets by ensuring vouchers redeemed while the validation system is out of operation are validated through the validation system as soon as reasonably possible to ensure tickets are properly recorded as redeemed in the system and for reconciliation purposes.</p> <p><b>Testing:</b></p> <ol style="list-style-type: none"> <li>1. Review TICS and/or SICS to determine the procedure for paying vouchers when the voucher system is down.</li> <li>2. Interview appropriate personnel if no sample can be located to verify procedure (e.g. Cage Cashier, Floor Cashier)</li> <li>3. Review sample of vouchers paid while the system is down. Including reviewing the report from the validation system to verify tickets were redeemed within a reasonable time frame after the system was restored.</li> </ol>
<p>543.18(h)(4)</p>	<p><i>Vouchers.</i></p> <p>(4) Paid vouchers must be maintained in the cashier's accountability for reconciliation purposes.</p>	<p><b>Intent:</b> To prevent potential misappropriation of assets by ensuring vouchers are accounted for and available for reconciliation purposes.</p> <p><b>Testing:</b></p> <ol style="list-style-type: none"> <li>1. Interview appropriate personnel to determine accountability for reconciliation procedure (Cage Management, Cage Cashiers).</li> <li>2. Observe vouchers in the cashier's bank and end-of-shift reconciliation.</li> <li>3. Review cashier's reconciliation report from the voucher redemption system.</li> </ol>

543.18(h)(5)	<p><i>Vouchers.</i></p> <p>(5) Unredeemed vouchers can only be voided in the voucher system by supervisory employees. The accounting department will maintain the voided voucher, if available.</p>	<p><b>Intent:</b> To prevent potential misappropriation of assets by requiring supervisory personnel to void unredeemed vouchers and to providing for a separate department to maintain voided vouchers.</p> <p><b>Testing:</b></p> <ol style="list-style-type: none"> <li>1. Test a sample of voided vouchers and the report that identifies the person who voided the voucher to determine that it was completed by supervisory employees.</li> <li>2. Review permission listing from the voucher redemption system to verify only supervisory employees can void unredeemed vouchers.</li> </ol>
<b>§ 543.18(i)</b>		
543.18(i)(1)	<p><i>Cage and vault access.</i> Controls must be established and procedures implemented to:</p> <p>(1) Restrict physical access to the cage to cage agents, designated staff, and other authorized persons; and</p>	<p><b>Intent:</b> To provide for the protection of assets and restrict access to cash handling and storage areas.</p> <p><b>Testing:</b></p> <ol style="list-style-type: none"> <li>1. Review TICS and/or SICS to determine what controls and procedures are established for restricting access to the cage and vault.</li> <li>2. Review current access listing to determine access to the cage and vault area is adequately restricted. Inquire and/or observe with cage and vault management how</li> </ol>

		access is restricted (door buzzer, key card, and/or physical key(s)) and confirm access to key cards and/or keys granting access to cage and vault areas is adequately controlled.
543.18(i)(2)	<p><i>Cage and vault access.</i> Controls must be established and procedures implemented to:</p> <p>(2) Limit transportation of extraneous items such as personal belongings, tool boxes, beverage containers, etc., into and out of the cage.</p>	<p><b>Intent:</b> To provide for the protection of assets and limit extraneous items from being in cage and vault areas.</p> <p><b>Testing:</b></p> <ol style="list-style-type: none"> <li>1. Review TICS and/or SICS to determine what controls and procedures are established for limiting extraneous items in the cage and vault.</li> <li>2. Observe cage and vault areas to confirm extraneous items are limited in the cage and vault areas in accordance with established controls.</li> </ol>
<b>§ 543.18(j)</b>		
543.18(j)	<p><i>Variances.</i> The operation must establish, as approved by the TGRA, the threshold level at which a variance must be reviewed to determine the cause. Any such review must be documented.</p>	<p><b>Intent:</b> To provide for the protection of assets and establish review and investigation processes for identified variances in cage and vault accountabilities and transactions.</p> <p><b>Testing:</b></p> <ol style="list-style-type: none"> <li>1. Review TICS and/or SICS to determine what controls and procedures are established for the threshold level at which</li> </ol>

		<p>variances are reviewed. <b>Note:</b> It is recommended that the controls also identify the type(s) of variances reviewed.</p> <ol style="list-style-type: none"><li>2. For the selected test period, inquire with cage and/or accounting personnel to determine whether any variances for the established threshold had occurred.</li><li>3. Review system reports (if available) and cage and vault count accountability documents to determine whether any variances for the established threshold had occurred. For variances identified, review documentation for variance review(s) to determine whether the cause was identified and the reviews were adequately documented.</li></ol>
--	--	---

**25 CFR 543.18 Toolkit**  
**Version 1.0**  
**NIGC Division of Public Affairs**

National Indian Gaming Commission

Training Manager  
Training Program