

May
21<sup>st</sup> – 23<sup>rd</sup>
2019

# National Indian Gaming Commission Sacramento North Regional Training Conference



Located at

Tachi Palace Hotel & Casino 17225 Jersey Avenue Lemoore, CA 93245



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#### **Opening Welcome/Ice Breaker**

#### **Regional Panel Discussion**

### State Perspective on Current Trends in Casinos

Lunch (On Your Own)

#### Internal Revenue Service (Title 31/BSA, SAR and CTR's)

FinCEN, the BSA & Casino AML Program Enforcement

**Federal Bureau of Investigation (Suspicious Activity Reports)** 

Wrap Up, Discussion, and Questions

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	DAY 2	
Track 1	Track 2	Track 3
Top Regional Findings *	IGRA	IT Overview and the Importance of IT REGS
Promotions and Player Tracking the Real Risk to Your Bottom Line	Background and Licensing	Intro to Gaming Technology Building IT TICS
	Lunch (On Your Own)	
Bingo Shipping and Receiving: Who's Communicating *	Background and Licensing (continued)	Building IT TICS (continued)
Bingo Machine Files: Installation, Maintenance, and Removal *	Understanding the CHRI	Principals of Auditing; 543.20
Inventory; Any inventory *	Small and Charitable Gaming	Finicipals of Additing, 343.20
Wrap	Up, Discussion, and Questions	5
	DAY 3	
Track 1	Track 2	Track 3
Understanding Auditing Revenue (Risk Based)	Misuse of Gaming Revenue	Pre/Post 2008 547 Compliance
Applying Auditing Revenue	Compliance Roles and Responsibilities *	Incident Reporting
	Lunch (On Your Own)	
Applying Audit Revenue	Compliance Roles and Responsibilities	Incident Reporting (continued)
(continued)	(continued) *	Trending IT Issues
Auditing Revenue "The Little	How to Write an Effective	
Things"	Report *	Round Robin Q&A
W/ran	Up, Discussion, and Questions	

#### Courses and times are subject to change



#### Day 1 - General Session

Time	Course	Target Audience	Course Description
9:00	Opening and Ice	All	
	Breaker		
	(0.5 hr.)		
9:30	Regional Panel	All	A panel discussion involving National Indian
	Discussion		Gaming Commission staff members from the
	(1.0 hrs.)		Office of General Counsel, the Region Office
			Compliance, and Audit. The discussion will
			focus on what is trending in Indian Gaming
			and Regional Issues. Attendees can pose
			regulatory questions specific to their
			operations or trends in Indian Gaming.
10:30	State Perspective on	All	Special Agent Tyler Burtis, CADOJ Bureau of
	Current Trends in		Gambling Control will discuss current criminal
	Tribal Gaming (1.5		trends occurring in commercial and tribal casinos
	hrs.)		and the duties and relationship of BGC with the
			tribes and NIGC.
12:00		Lunch on y	
1:00	IRS Indian Tribal	Tribal Gaming	This course will cover several Title 31/Bank
	Government (Title	Regulators and Gaming	Secrecy Act (BSA) topics:
	31/BSA, SAR and	Commissioners, Casino	What to expect during a tribal casino BSA
	CTR's)	Operations Personnel	exam
	(1.0 hrs.)	responsible for Title 31,	Internal/External independent testing
		SAR and CTR for their	requirements
		operations.	Recent BSA exam findings
			Hot Topics
2:00	FinCEN, the BSA &	Tribal Gaming	This course will cover several FinCEN topics:
	Casino AML	Regulators and Gaming	Anti-Money Laundering Programs
	Program	Commissioners, Casino	FinCEN Investigations
	Enforcement	Operations Personnel	Enforcement Actions
	(1.0 hr.)		Hot Topics
3:00	FBI Current	Tribal Gaming	This course will share the impact of SARs and
	developments and	Regulators and Gaming	how they assist the FBI in
	Issues Related to	Commissioners, Casino	investigations. Attendees will gain insights
	Suspicious Activity	Operations Personnel	into current schemes used by casino patrons
	Reports (SARs)	responsible for filing or	and how law enforcement can better partner
	(1.0 hr.)	completing SAR's.	with Casinos.
4:00			sion, and Questions



#### Track 1 - Day 2

Time	Course	Target Audience	Description
9:00	Top Regional Findings (1.0 hr.)	Internal Auditors, TGRA staff including Compliance Officers, Licensing Agents, Operations staff including department supervisors and managers responsible for developing SICS and policy and procedures.  Internal Auditors, TGRA staff	The Top 10 most common non-compliance findings specific to the Region as identified through annual AUP reports, internal audit reports and NIGC monitoring will be presented, along with specific instructions and exercises that focus on the intent of the control as well as identification, development, and implementation of remedies for the findings. Attendees will obtain increased understanding and additional skills to identify and remedy like findings at their gaming operations.  This course will provide specific
10.00	and Player Tracking the Real Risk to your bottom Line (2.0 hrs.)	including Compliance Officers, IT Auditors, Operations staff including department supervisors and managers responsible for developing and approving SICS and policy and procedures.	instructions and exercises focusing on the intent of the Promotions and Player Tracking controls. Attendees will obtain increased understanding and additional skills to identify and remedy deficiencies with promotional rules and identify ways to control parameters in their player tracking systems.
12:00		Lunch on your o	•
1:00	Bingo Shipping and Receiving: Who's Communicating (1.0 hr.)	Internal Auditors, TGRA staff including Compliance Officers, Operations staff including department supervisors and managers responsible for developing SICS and policy and procedures.	This course will provide specific instructions and exercises focusing on developing TICS and SICS. Attendees will obtain increased understanding and additional skills to identify and remedy communication and documentation issues in the shipping and receiving process, which can be applied to other areas.



#### Track 1 - Day 2 (continued)

Time	Course	Target Audience	Description
2:00	Bingo Machine	Internal Auditors, TGRA staff	This course will provide specific
	Files:	including Compliance Officers,	instructions and exercises that focus
	Installation,	Gaming Machine Staff including	on file maintenance and
	Maintenance,	Slot Tech's and Slot Floor	documentation. Attendees will obtain
	and Removal	Operations, other Operations staff	increased understanding and
	(1.0 hr.)	including department supervisors	additional skills to identify and remedy
		and managers responsible for	deficiencies with documentation and
		developing SICS and policy and	understand the importance of
		procedures.	maintaining good records.
3:00	Inventory; Any	Internal Auditors, TGRA staff	This course will provide specific
	Inventory	including Compliance Officers,	instructions and exercises that focus
	(1.0 hr.)	Operations staff including	on the importance of segregation of
		department supervisors and	duties and documentation in the
		managers responsible for	inventory control process. Attendees
		developing SICS and policy and	will obtain increased understanding
		procedures.	and additional skills related to the
			critical aspects of inventory control
			specific to bingo which can be applied
			to other types of inventory.
4:00		Wrap Up, Discussion, and	d Questions



#### Track 1 - Day 3

9:00	Understanding	Revenue Auditors	An overview of the revenue audit process, NIGC
	Auditing	and Operational	standards, and best practices which will give
	Revenue	and/or Compliance	attendees an understanding of why it's vital for
	(2.0 hrs.)	staff who may	every gaming operation to have an effective
		perform revenue	revenue audit function to protect the assets of the
		audit procedures	Tribe and the reputation of the gaming operation.
11:00	Applying	Revenue Auditors	An in-depth look at revenue audit processes will be
	Auditing	and Operational	presented using discussions, practical exercises,
	Revenue	and/or Compliance	and handouts which will give attendees a practical
	(3.0 hrs.)	staff who may	look at what it takes to make and maintain an
		perform revenue	effective revenue audit function. Attendees will
		audit procedures	obtain increased understanding behind the intent
			of specific revenue audit processes and skills on
			how to effectively perform revenue audit
			procedures.
12:00		Lun	ch on your own
1:00	CONTINUED	CONTINUED	CONTINUED
3:00	Auditing	Revenue Auditors	A look at the processes of revenue audit and the
	Revenue; The	and Operational	"how to" by using; discussions, practical exercises,
	Little Things	and/or Compliance	and handouts. The course will look at scheduling of
	(1.0 hr.)	staff who may	revenue audit procedures, documenting
		perform revenue	performance of procedures, drafting notices of
		audit procedures	findings, and following-up on any issues identified
			so they can be corrected.
4:00		Wrap Up, Di	scussion, and Questions



#### Track 2 - Day 2

Time	Course	Target Audience	Course Description
9:00	Indian Gaming	Tribal Regulatory	Participants will learn how to avoid enforcement
	Regulatory Act	Commission,	actions through compliance. The course will give
	(IGRA)	Operations Personnel of	participants an overview of the requirements of
	(1.0 hr.)	all levels of a tribal	IGRA and how non-compliance with one or more
		operation	of these requirements can be a violation of IGRA.
10:00	Background	Background	This course focuses on the investigation and
	and Licensing	investigators, Licensing	licensing process of key employees and primary
	(3.0 hrs.)	technicians and Gaming	management officials. Attendees will learn the
		Commissioners directly	components of background investigations,
		responsible for	verification process of the gaming applications,
		conducting background	and use of background investigation results to
		and making eligibility	make eligibility determinations. Attendees will also
		determinations for Key	learn the procedures for submitting notifications of
		Employees and Primary	results (NOR) and issuance of gaming license
		Management Officials	notices (IOL) for Key Employees and Primary
			Management Officials to the NIGC.
12:00		Lunc	h on your own
1:00	CONTINUED	CONTINUED	CONTINUED
2:00	Understanding	Background	This course will discuss the information within a
	the CHRI	investigators, Licensing	FBI Criminal History Record Information (CHRI)
	(1.0 hr.)	technicians and Gaming	report, its limitations, proper use and storage.
		Commissioners directly	Attendees will learn how to use the CHRI report to
		responsible for	determine a key employee or primary
		obtaining and utilizing	management officials eligibility for a tribal gaming
		FBI criminal history	license, how to give proper notice to applicants
		record information.	about the use of the CHRI and the importance of
			restricting access to the CHRI information.
3:00	Small and	TGRA staff including	Did you know that IGRA requires charitable gaming
	Charitable	Compliance Officers,	to be regulated? Are you doing enough? This
	Gaming	Licensing Agents, Tribal	course examines the legal ins and outs of
	(1.0 hr.)	Leadership	regulating charitable gaming on Indian lands.
			Participants will learn what is considered Indian
			lands (hint: it may be more than you think!), what
			responsibilities the tribal gaming regulatory
			authority has for regulating gaming, and which
			exemptions apply to charitable operations.
4:00		Wrap up Qu	estions and Answers



#### Track 2 - Day 3

9:00	Misuse of Gaming	Tribal Gaming	Misuse of gaming revenues can occur
	Revenue	Commissions, Compliance	when gross gaming revenues are not used
	(2.0 hrs.)	and Audit personnel, and	for legitimate operating expenses of the
	, , ,	Casino Management.	gaming operation, potentially violating the
			Net Gaming Revenue uses defined in
			IGRA. This course will identify and discuss
			such practices with respect to corporate
			credit cards, donation accounts, wire
			transfers, ad hoc tribal programs and
			payments made directly to tribal members
			by the gaming operation.
			Attendees will obtain increased
			understanding and additional skills to
			identify and remedy misuses at their
			gaming operations.
11:00	Compliance Roles	TGRA Compliance	This course will explain the benefits and
12.00	and Responsibilities	Officers, Licensing Staff,	attributes of independent gaming
	(2.0 hrs.)	and Gaming Commission.	commissions along with recommendations
	(=10 10.)		for establishing independent gaming
			commissions. Regulatory responsibilities
			required by IGRA and NIGC regulations are
			also discussed. The Attendee will obtain
			an understanding of the benefits and
			limitations of independence.
12:00		Lunch on you	
1:00	CONTINUED	CONTINUED	CONTINUED
2:00	How to Write an	Tribal Gaming Regulatory	This course focuses on preparing reports
	Effective Report	Authorities (TGRA)	and explores techniques of organizing and
	(2.0 hrs.)	including Commissioners,	structuring the report to comply with
		Compliance Officers,	proper guidelines. This class will discuss
		Security and Surveillance.	the characteristics of an effective report
		Operations staff including	using When, Where, Who, What, How and
		all supervisors and	Why and discuss best practices within the
		managers responsible for	gaming industry. Attendees will
		writing reports.	participate in real life work scenarios
			based on operational and regulatory
			points of view.
4:00		Wrap Up, Discussion,	and Questions



## Course Agenda/Descriptions Track 3 - Day 2

Time	Course	Target Audience	Course Description
9:00	IT Overview and	Tribal Gaming	This course is designed to go over current
	the Importance of	Regulators, Operations	industry statistics and analysis and the
	IT REGS.	personnel and IT	importance of regulations from the Federal,
	(1.0 hr.)	personnel of all levels	State and Tribal level
10:00	Introduction to	Tribal Gaming	This course is designed to outline the basics of
	Gaming	Regulators, Operations	Gaming System networks and their
	Technology	personnel, and	significance. Types of technology typically
	(1.0 hr.)	Introductory level IT	found in a casino environment including Class II
		personnel	and Class III gaming technology will be covered
11:00	Building IT TICS	Tribal Gaming	This course is a refreshed course to assist with
	(2.0 hrs.)	Regulators, Technical	understanding the importance of clear and
		Compliance officers,	concise IT controls by utilizing the STEFF model
		and Managerial IT	as a framework. The course will also address 3
		personnel	internal control types and how they affect
			proper TICS creation and immersion into
			current TICS/SICS.
12:00		Lunch o	n your own
1:00	CONTINUED	CONTINUED	CONTINUED
2:00	Principles of	Tribal Gaming	The importance and intent of CFR 543.20 (IT –
	<b>Auditing: 543.20</b>	Regulators, Operations	MICS) will be discussed through real-world
	(2 hrs.)	personnel, IT	examples of common IT findings, how to
		personnel, and	address findings, and reviewing sound auditing
		Introductory level	practices.
		Auditors of IT systems	
4:00		Wrap up Quest	tions and Answers



#### Track 3 - Day 3

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9:00	Regulators	Tribal Gaming Regulators,	In this course we will cover the
	Pre/Post 2008 547	Operations and IT personnel	significance of the final NIGC ruling
	Compliance		regarding the 547 technical standards
	(1.0 hr.)		from a regulatory and operations
			standpoint as well as providing practical
			tips for determining if electronic gaming
			machines are pre or post-2008
			compliant.
10:00	Incident Reporting	Tribal Gaming Regulators,	This course is a new course, this activity
	(2.5 hrs.)	Operations and IT personnel	driven class will cover the nature and
			importance of having robust incident
			reporting and cyber security defense
			procedures in place. Additionally, both
			preventative and responsive controls
			·
			and tools will be discussed.
12:00		Lunch on your	and tools will be discussed.
12:00 1:00	CONTINUED	Lunch on your of CONTINUED	and tools will be discussed.  own  CONTINUED
	Trending IT Issues	CONTINUED Tribal Gaming Regulators,	and tools will be discussed.
1:00		CONTINUED	and tools will be discussed.  own  CONTINUED
1:00	Trending IT Issues	CONTINUED Tribal Gaming Regulators,	and tools will be discussed.  own  CONTINUED  This exciting new course will focus on current and upcoming issues within the gaming IT realm and how those topics
1:00	Trending IT Issues	CONTINUED Tribal Gaming Regulators,	and tools will be discussed.  own  CONTINUED  This exciting new course will focus on current and upcoming issues within the gaming IT realm and how those topics will affect the greater casino
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1:00	Trending IT Issues	CONTINUED Tribal Gaming Regulators,	and tools will be discussed.  own  CONTINUED  This exciting new course will focus on current and upcoming issues within the gaming IT realm and how those topics will affect the greater casino industry. A multitude of covered topics will include discussion points such as,
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1:00 1:30	Trending IT Issues (2.0 hrs.)	CONTINUED Tribal Gaming Regulators, Operations and IT personnel	and tools will be discussed.  own  CONTINUED  This exciting new course will focus on current and upcoming issues within the gaming IT realm and how those topics will affect the greater casino industry. A multitude of covered topics will include discussion points such as, sports betting, geofencing, AI, and social networks
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1:00 1:30	Trending IT Issues (2.0 hrs.)	CONTINUED Tribal Gaming Regulators, Operations and IT personnel	and tools will be discussed.  own  CONTINUED  This exciting new course will focus on current and upcoming issues within the gaming IT realm and how those topics will affect the greater casino industry. A multitude of covered topics will include discussion points such as, sports betting, geofencing, AI, and social networks  Discussion period to review and answer any lingering questions you may have
1:00 1:30	Trending IT Issues (2.0 hrs.)	CONTINUED Tribal Gaming Regulators, Operations and IT personnel  Tribal Gaming Regulators,	and tools will be discussed.  own  CONTINUED  This exciting new course will focus on current and upcoming issues within the gaming IT realm and how those topics will affect the greater casino industry. A multitude of covered topics will include discussion points such as, sports betting, geofencing, AI, and social networks  Discussion period to review and answer any lingering questions you may have concerning what was covered during
1:00 1:30	Trending IT Issues (2.0 hrs.)	CONTINUED Tribal Gaming Regulators, Operations and IT personnel  Tribal Gaming Regulators,	and tools will be discussed.  own  CONTINUED  This exciting new course will focus on current and upcoming issues within the gaming IT realm and how those topics will affect the greater casino industry. A multitude of covered topics will include discussion points such as, sports betting, geofencing, AI, and social networks  Discussion period to review and answer any lingering questions you may have concerning what was covered during the two-day track.