



# DC

## Regional Guidance on the Issues

Panel Discussion

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## Commission's Initiatives

- Rural Outreach
- Staying ahead of the Technology Curve
- Supporting a strong workforce both in-house and among our regulatory partners
- Protect against anything that amounts to gamesmanship on the back of tribes

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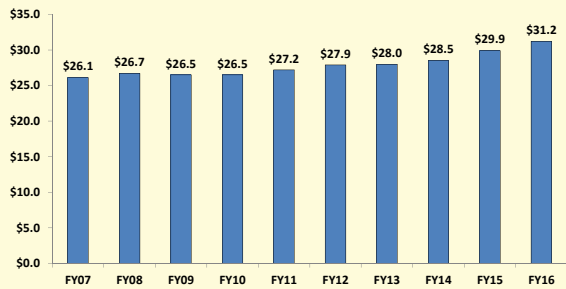
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## FY2016 GGR



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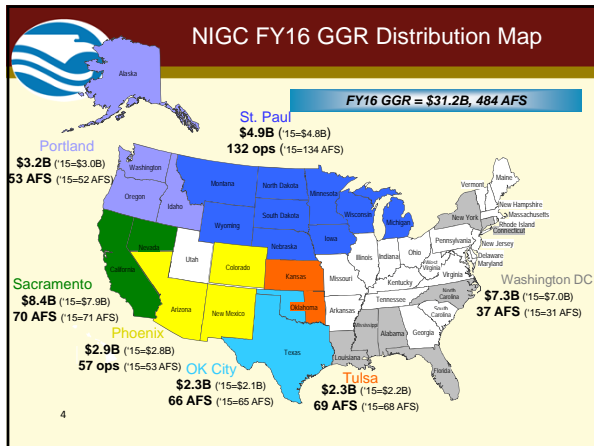
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**DC Region**

- **7 States – Currently Gaming under IGRA**
- **Alabama, Connecticut, Florida, Louisiana, Mississippi, North Carolina, New York**
- 15 Tribes – 37 gaming operations:
 

Class II only	15
Class III only	5
Class II/III	17

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**DC Region**

- **Two Tribes in Massachusetts Currently in litigation:**
  - Mashpee Wampanoag Tribe
    - Currently preparing additional documentation for a land in trust determination from Interior
      - Large facility in Taunton
  - Wampanoag Tribe of Gay Head
    - Currently waiting on Courts to determine legality of gaming
      - Small Class II only facility

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## Backgrounds & Licensing

October 2015 to September 2016:

Fingerprints Processed – 12,059

NORs Received – 8,579

LIC NOTIF Received – 8,377

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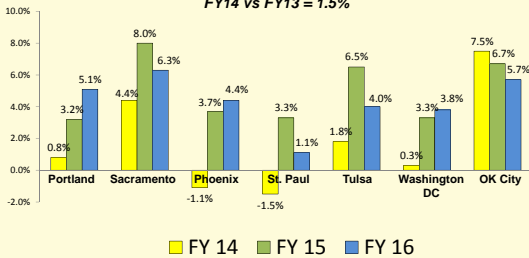
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## GGR Growth Rate By Region

**Overall Growth Rate**  
FY 16 vs FY15 = 4.4%  
FY15 vs FY14 = 5.0%  
FY14 vs FY13 = 1.5%



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## Regional Compliance Issues/Guidance

### ISSUE:

- Submissions of Facility License/Attestation
- Submissions of NOR/LIC Submissions, AFS and Fees Worksheets
- Internal control compliance
- TGRA/Management/Govt. relationship
- Gamesmanship

### GUIDANCE:

- Expiration/Renewal
- Timeliness/Systemic review, Reminders and offer of Assistance
- IA, CPA, Compliance Staff- 543 testing, identify, remedy, follow-up
- NIGC assistance/Site Specific Training
- Review the contracts

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## Office of General Counsel

### OGC Technical Assistance:

- Informal Gaming Ordinance Review
- Indian Lands Opinions
- Game Opinions
- Declination Letters

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## Technology Division

### Common ITVA Issues

#### Identified

- Microsoft Patches not updated
- Virtual Network Computers unsecured
- Remote username/passwords unencrypted

### IT General Interactions

1. Remote Access
2. Network Security
3. Vendor Issues

### Regulating Gaming Trainings (RGT's)

#### Questions

1. Forensics
2. Class II Systems
3. IT Threats

### Common Compliance Assessments

#### (ICA's) Issues Encountered

1. Remote Access
2. Policy and Procedures
3. Logical Security – proper username/passwords in place

Technology Division provides free IT Vulnerability Assessments that assist with identifying IT Network deficiencies sign up at <http://www.nigc.gov>

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## Audit

- Internal Control Assessments
  - Limited Scope review of specific areas

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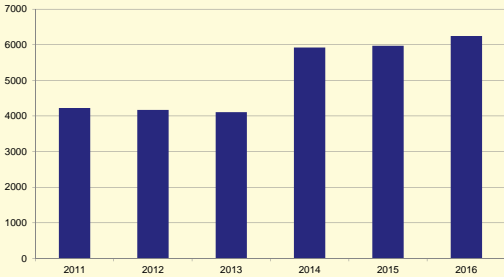
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## Overall MICS AUP Exceptions

MICS Exceptions for Indian Gaming




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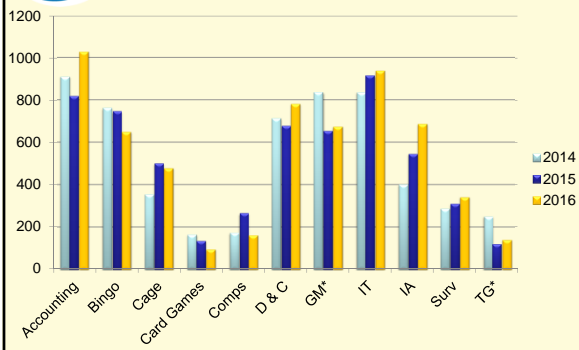
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## Breakdown by Section




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## 543 Tied #5 Finding

- Drop and Count 543.17(k)
  - *Variances*
    - The operation must establish, as approved by TGRA, threshold level at which a variance must be reviewed to determine cause.
    - Any such review must be documented.

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## 543 Tied #5 Finding

- Drop and Count 543.17(e)(3)
  - *Player interface and financial instrument storage component drop*
    - Financial instrument storage components removed only at time previously designated by gaming operation and reported to TGRA.
    - If emergency drop is required, surveillance must be notified before drop is conducted and TGRA must be informed within timeframe approved by TGRA.

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## 543 Tied #5 Finding

- Auditing Revenue 543.24(d)(10)(i)
  - Establish controls and implement procedures:
    - Inventory
      - Monthly, verify receipt, issuance, and use of controlled inventory
      - Includes, but not limited to, bingo cards, pull tabs, playing cards, keys, pre-numbered and/or multi-part forms.

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## 543 Tied #5 Finding

- Auditing Revenue 543.24(d)(4)(ii)(c)
  - Establish controls and implement procedures:
    - Gaming Promos and Player Tracking
      - Monthly, review promotional payments, drawings, and giveaway programs
      - Verify payout accuracy and proper accounting treatment in accordance with rules provided to patrons
      - Review documentation related to access to inactive and closed accounts

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## 543 Tied #2 Finding

- Cage, Vault, Kiosk, Cash and Cash Equivalents 543.18(c)(2)
  - *Cage and Vault Accountability*
    - Increases and decreases to 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).

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## 543 Tied #2 Finding

- Cage, Vault, Kiosk, Cash and Cash Equivalents 543.18(c)(3)
  - *Cage and Vault Accountability*
    - Cage/vault inventories must be counted independently by at least two agents, attested to by signature, and recorded in ink or other permanent form at end of each shift during which activity took place.
    - Agents must make individual counts to compare for accuracy and maintain individual accountability.
    - Variances must be documented and investigated.

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## 543 Tied #2 Finding

- Auditing Revenue 543.24(d)(8)(i)
  - Controls must be established and procedures implemented to audit each of the following operational areas:
    - Drop and Count
      - Quarterly, unannounced currency counter and currency counter interface (if applicable) test must be performed
      - The test results must be documented and maintained

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## 543 #1 Finding

- Auditing Revenue 543.24(d)(4)(iii)
  - Establish controls and implement procedures to audit the following operational area:
  - Gaming Promos and Player Tracking
    - Annual review of computerized player tracking systems
    - Ensure configuration parameters are accurate and alterations have authorization from management
    - Review performed by agent(s) independent of individuals that set up/change system parameters
    - Document and maintain the test results.

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## Summary of 543 findings

A majority of 543 findings are as it relates to the sections that require;

- Controls must be established
- Procedures implemented
- Thresholds established
- Actions documented

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## Regional Offices

WASHINGTON NATIONAL OFFICE  
 WASHINGTON, DC 20005  
 PHONE: (202) 632-7003

PHOENIX REGIONAL OFFICE  
 PHOENIX, AZ 85012  
 PHONE: (602) 640-2951

PORTLAND REGIONAL OFFICE  
 PORTLAND, OR 97205  
 PHONE: (503) 326-5095

TULSA REGIONAL OFFICE  
 TULSA, OK 74103  
 PHONE: (918) 581-7924

SACRAMENTO REGIONAL OFFICE  
 SACRAMENTO, CA 95814  
 PHONE: (916) 414-2300

ST. PAUL REGIONAL OFFICE  
 ST. PAUL, MN 55101  
 PHONE: (651) 290-4004

OK CITY REGIONAL OFFICE  
 OKLAHOMA CITY, OK 73102  
 PHONE: (405) 609-8626

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## NIGC Training Program

- Revising training approach to be more process driven.
  - “How To” instead of “How Come”
- New workshops Internal Audit (16hr training) TICS/SICS
- In the future Learning Management System
- A call for suggestions!

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## Questions



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## Course Evaluation

- Provide an honest assessment of your experience
- Written suggestions and comments are greatly appreciate and allow us to improve your experience



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**Course Eval - Regional Guidance**  
When survey is active, respond at [PollEv.com/nigc](https://PollEv.com/nigc)

**Start the presentation to activate live content**  
If you see this message in presentation mode, install the add-in or get help at [PollEv.com/app](https://PollEv.com/app)  
© 0 surveys underway

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