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 **Tier Levels**

- Tier A
  - \$3 million to \$8 million
- Tier B
  - \$8 million to \$15 million
- Tier C
  - More than \$15 million

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 **Supervision 543.17(a)**

- Must be provided for drop and count as needed
- Authority must be equal to or greater than those being supervised

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### Count Room Access 543.17(b)

- Limit physical access to the count room to authorized personnel:
  - Exiting or entering the count room
  - Surveillance notification of entry and exit
  - Limit transportation of extraneous items into and out of the count room

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### Count Team 543.17(c)

- Security of the count and count room:
  - **Tier A and B operations:**
    - Count performed by at least two agents
    - Count team must be rotated
  - **Tier C operations:**
    - Count performed by at least three agents
    - Count team must be rotated

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### Count Team 543.17(c)

- Security of the count and count room (cont.):
  - Count team functions must be rotated routinely
  - Count team agents must be independent of the department counted
    - Use of Cage/Vault if not sole recorder
    - Accounting agents if independent audit of count documentation

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### Drop Standards 543.17(d)

- Security of the card games drop process:
  - Surveillance notification at start of drop
    - Once drop has begun, must be performed to completion
  - Requires two agents
    - One independent of card games
  - Designated time for drop, once started must finish
    - Emergency drop, surveillance notified at beginning and TGRA notified in approved timeframe

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### Drop Standards 543.17(d)

- Card games end of shift requirements:
  - Independent agent must remove locked drop boxes from table
  - Separate drop box for each shift
    - One box with separate compartments is sufficient
  - Transport drop boxes directly to secure area
    - Requires two agents (one independent of shift being dropped)
    - Maintained in secure area until count is performed

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### Drop Standards 543.17(d)

- Card games:
  - Document tables not opened during shift and not part of drop
  - Permanent numbering of drop boxes

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### Drop Standards 543.17(e)

- Security of the player interface drop process:
  - Surveillance notification at start of drop
  - Requires two agents
    - One independent of class II machines
  - Performed at designated time for drop, reported to TGRA
    - Emergency drop, surveillance notified at beginning and TGRA notified in approved timeframe

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### Drop Standards 543.17(e)

- Player interface drop standards:
  - Independent agent must remove storage components from interface
  - Provide security over storage components removed from player interfaces and awaiting transport

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### Drop Standards 543.17(e)

- Player interface drop standards (cont.):
  - Transport drop boxes directly to secure area
    - Must be performed by two agents (one independent of class II machines)
    - Maintained in secure area until count is performed
  - Storage components must have number corresponding to number on player interface

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### Count Standards 543.17(f)&(g)

- Access to stored full drop boxes and storage components restricted to:
  - Drop and count teams
  - Authorized agents in emergency
- Count performed in secure area
- Count room access must be restricted to authorized personnel

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### Count Standards 543.17(f)&(g)

- Procedures to prevent commingling funds
- Restricted access to meter amounts until after proceeds accepted into vault accountability
- Test count equipment and systems prior to beginning of count

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### Count Standards 543.17(f)&(g)

- Use of currency counter interface:
  - Restrict to prevent unauthorized access
  - Direct communications line or computer storage media for data transfer

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### Count Standards 543.17(f)&(g)

- Empty boxes and components individually to ensure proper recording
  - Recorded permanently (ink or other)
  - Coupons or other promotional items
    - Single-use coupons must be cancelled daily
  - For drop box counts not using currency counter:
    - Second, individual count must be performed
      - Always performed for chips

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### Count Standards 543.17(f)&(g)

- Use of Currency counter:
  - Observe all loading and unloading
  - Two counts of rejected currency, must be recorded per table/interface and in total
    - Rejected currency must be posted to the appropriate table/interface
- Boxes/components must be shown to another or surveillance (if continuously monitored) when emptied

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### Count Standards 543.17(f)&(g)

- Corrections to count documentation
  - Permanent, identifiable, with original info legible
  - Verified by two count team agents
- Count sheet must be reconciled to the total drop
  - Performed by agent not acting as sole recorder
  - Reconcile and document variances
- Entire count team must sign the report to show participation in count

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### Count Standards 543.17(f)&(g)

- Final verification of total drop prior to transfer:
  - Compare counted totals to system report
  - Unresolved variances documented & documentation forwarded to accounting
  - Final verification by two agents, one a count supervisor
    - Both sign report for accuracy

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### Count Standards 543.17(f)&(g)

- Final verification of total drop prior to transfer:
  - Proceeds given to Cage/Vault associate, or other independent agent
    - Agent will perform independent verification
    - Agent will certify amount by signature
  - Unresolved variances reconciled, documented, and/or investigated by Acct/ Revenue Audit

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### Count Standards 543.17(f)&(g)

- Transfer of drop proceeds
  - No transfer of count documentation and records with proceeds
    - Cage/vault must sign count sheet for verification
  - Cage/vault must have no knowledge of total drop before verification
  - Unresolved variances must be documented and investigated
- Records transferred to accounting by agent independent of cage/vault

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### Kiosk Drop Standards 543.17(h)

- Removal of cassettes and storage components
  - Surveillance is notified prior to access
  - At least two agents involved in collection (one independent of kiosk accountability)
  - Secured and only accessible by authorized agents

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### Kiosk Drop Standards 543.17(h)

- Removal of cassettes and storage components
  - Collected vouchers must be secured and delivered to appropriate department for reconciliation
  - Ensure currency cassettes contain correct denominations and are installed properly

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### Kiosk Count Standards 543.17(i)

- Access to full storage components and cassettes are restricted to:
  - Authorized agents
  - Authorized persons in case of emergency
- Kiosk count must be performed in secure area
  - Procedures must be developed to prevent commingling of funds with other revenue centers

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## Kiosk Count Standards 543.17(i)

- Cassettes and storage components individually emptied and counted to prevent commingling
  - Count recorded in ink or other permanent form
  - Coupons and promo items not included in gross revenue recorded on a separate document
- Procedures implemented for corrections to count documents
  - Must be permanent and identifiable with corrected information legible
  - Corrections verified by two agents

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## Controlled Keys Standards

- **NOTE: Due to an error in publication to the Federal Register, the majority of the Controlled Keys section was inadvertently removed when Part 543 was amended on October 25, 2013. The NIGC is in the process of re-instating the Controlled Keys standards; however, until the standards are re-instated the information regarding key controls should be considered advisory in nature. The following compliance information anticipates the intact re-instatement of the Key Control standards 543.17(j)(1)(i) through 543.17(j)(9).**

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## Controlled Keys Standards

- Safeguard use, access and security of keys
  - The following require separate and unique key lock or alternative secure access method:
    - Drop cabinet
    - Drop box release
    - Drop box content
    - Storage racks and carts
    - Kiosk release
    - Kiosk box content

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## Controlled Keys Standards

- Documentation of access to and return of drop and count keys
  - **Tier A and B operations**
    - At least two drop team agents access and return keys
    - At least two count team agents access and return count keys
  - **Tier C operations:**
    - At least three drop team agents access and return keys
    - At least three count team agents access and return count keys (only two agents if three or fewer tables)

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## Controlled Keys Standards

- Documentation of all keys (including duplicates):
  - Unique identifier
  - Key storage location
  - Number of keys made, duplicated, destroyed
  - Authorization and access

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## Controlled Keys Standards

- Custody of drop and count keys independent of D&C and the respective department
- Other than count team, no simultaneous access of content keys with storage rack and/or release keys
- Only agent authorized to remove drop boxes may access the release keys
- Keys used outside of drop and count require authorization and documentation

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### Controlled Keys Standards

- Emergency manual keys for key systems
  - Access
  - Issuance and return
  - Date, time, reason for access documented
  - Routine physical maintenance

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### Controlled Keys 543.17(j)

- Safeguard use, access and security of keys for kiosks

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### Variations 543.17(k)

- The threshold level at which a variance must be reviewed must be established
  - Type(s) of variance
  - Threshold level or percentage
  - Threshold must be approved by TGRA
  - Variance review must be documented

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## Questions



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