



**Participant Workbook**  
**Portland Regional Training Course**  
**Track 1**



Dear Training Course Participant,

Over twenty five years ago Congress adopted the Indian Gaming Regulatory Act (IGRA) to provide statutory support for gaming by Indian tribes. The National Indian Gaming Commission (NIGC) was created by IGRA to partner with tribal regulators 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.

A properly trained and informed workforce is the most successful key to regulation and the assurance of compliance. Focused, targeted and responsive training and technical assistance programs provide a foundation that maintains the integrity and success of Indian gaming.

Through dedication and hard work, Indian gaming has experienced notable and successful growth thanks to the partnership of dedicated employee's, regulators and tribal governments and the NIGC. Our continued success depends on grabbing the growing momentum and "*Work Together for Success*", now and into the coming future.

With this backdrop in mind, we encourage you to take advantage of the NIGC training opportunities highlighted by this course. The Commission recognizes your work is essential to the success of Indian gaming and encourages you to use the tools you will receive and knowledge you will gain from this course to further regulatory excellence in Indian gaming.



**Jonodev Osceola Chaudhuri**  
**NIGC Chairman**



**Kathryn Isom-Clause**  
**Associate Commissioner**



**E. Sequoyah Simermeyer**  
**Associate Commissioner**



## Course Rationale

The National Indian Gaming Commission (NIGC) Regional Training Course is designed to provide a common foundation of knowledge and skills to prepare Tribes to work together to effectively understand and meet requirements to ensure compliance and provide a successful basis for economic development.

NIGC Training is built around adult learning principles, with knowledge delivery for understanding and everywhere possible, application level exercises, workshops and opportunities to collaborate in or for each attendee to have an opportunity to achieve understanding, doing and getting feedback on results – and doing again! Working together and using the skills and knowledge applicable to improve processes as soon as they return to work.

### **The 6 key benefits to the NIGC Training Model:**

1. Provides real focus on issues and concerns important to attendees for meeting compliance.
2. Builds a sense of shared experience and language around the tools and methodologies.
3. Develops an understanding of the trends and concerns impacting Tribes and Indian Country in gaming.
4. Provides a safe environment for query, experimentation and failure.
5. Encourages application and testing in a true problem solving focus.
6. Provides a venue to develop relationships that improve communication, commitment and productivity.



## Course Descriptions

The Regional Training Course is designed around information and knowledge sharing dealing with current and ongoing issues and concerns in Indian Gaming, critical learning areas for compliance, and new and trending changes in regulation. Infused with real time information, current opportunities and ground breaking tools, the course provides all attendees flexible and relevant learning options. The course is designed for novice and veteran staff. The course will offer instruction in the following content areas:

### **Portland Region Guidance on the Issues**

The course is a panel discussion of the issues within the region. Participants will gain an understanding and discuss solutions surrounding issues they face in their region. It will highlight regional performance with comparative statistics to better gain an understanding of trends in the region. Topics will include the following: compliance issues with recommendations, legal issues with recommendations and audit issues with recommendations.

### **The Power of Observation: What Pre-Criminal Behavior Looks Like**

No course description available at time of print.

### **Human Trafficking**

Subject matter experts from the Bureau of Indian Affairs, U.S. Department of the Interior will provide the latest information on what Human Trafficking is and how to detect and combat this pervasive criminal activity.

### **Active Shooter Training**

Law Enforcement personnel from the Federal Protective Services, U.S. Department of Homeland Security will provide expert advice in developing policies and procedures for an active shooter situation.

## TRACK 1

### **AUD-120 Internal Audit: A to Z Approach**

Internal Audit is an integral component toward protecting the assets of the gaming operation by examining policies and procedures, testing internal controls and monitoring compliance with policies and regulations. The Internal Audit function can provide information to improve your operation's internal controls. 25 CFR Part 543.23 provides guidance; however, it was never intended to define the Internal Audit function. This is a 2-day course that will discuss the role internal audit plays along with the Tribal Gaming Regulatory Agency (TGRA) and Gaming Operation Management in the protection of assets. Additionally, the importance of planning, testing, documenting and reporting of the internal audit work will be examined to further the understanding of how each element enhances the usefulness of the final product.

## TRACK 2

### **OGC-104 Requirements of IGRA and Pitfalls of Non-Compliance**

Participants will learn how to avoid enforcement actions through compliance. The course will give participants an overview of the requirements of IGRA and how non-compliance with one or more of these requirements can be a violation of IGRA.

Participants will learn what happens when an IGRA violation is identified by the NIGC. The course provides an overview of the NIGC's enforcement process; the remedies available to the NIGC for a violation of IGRA; and the steps that can be taken by a tribe or 3rd party to overcome an IGRA violation and avoid an enforcement action.

### **IT-109 How to Audit to 543.20**

The NIGC Information Technology (IT) division is pleased to offer this new and exciting course Auditing 543.20. This instructor led course will review all sections of CFR543.20 and explore some of the problems identified during an NIGC IT Audit. The class provides real world examples of vulnerabilities documented by the IT Audit team and offers best practices to utilize as a guideline for assuring your operations and IT security. Audience participation is vital in working through class exercises and engaging individual views while reigniting IT awareness within casino operations.

### **OGC-103 Legal Opinions**

This course describes the three most common legal opinions requested of, and issued by, the NIGC's Office of General Counsel (OGC): declination letters, Indian lands opinions and gaming opinions It also describes the process for obtaining a legal opinion from OGC: from submitting a written request, to receiving a written opinion, and everything that happens in between.

### **CMP-106 Detecting Gamesmanship: A Practical Approach**

This course builds on the initiative training provided during FY2016: "Preventing Gamesmanship on the Backs of Tribes". The focus of this course is to provide TGRAs with tools to determine if Gamesmanship is occurring, to identify additional steps to be taken and documents to request, and to understand what steps can be taken to prevent gamesmanship at their properties. Attendees will learn how to review their gaming ordinance and regulations to identify sections that provide the needed authority to request and review contracts and agreements for violations of the Indian Gaming Regulatory Act (IGRA). Practical exercises will be conducted that will assist the attendee identify problematic language in contracts that indicate unapproved management, violations of the tribe's sole propriety interest and/or misuse of gaming revenue. At the end of this interactive course, the attendee will have tools necessary to identify Gamesmanship and know what actions can be taken to remedy or prevent instances of Gamesmanship and violations of IGRA.



### **AUD-108 Drop and Count – Class II**

During this presentation, discussion will revolve around 543.17 MICS specific to the drop and count process. Topics will include, but are not limited to: card game drop, count room controls, key control standards, emergency drop and count procedures and player interface and financial instrument storage drop and count procedures. Attendees will gain an enhanced understanding of the inherent risks associated with the drop and count process and how the 543.17 MICS are intended to mitigate those risks.

### **AUD-118 Auditing Revenue – Class II**

Participants will discuss 25 CFR part 543.24, MICS, specific to auditing revenue for Class II facilities. Topics will include, but not limited to: supervision, independence requirements of auditors, and documentation requirements across the various cash relevant areas of 543.



## How to Get the Most Out of This Course

- ❖ **Take the right approach to learning.** To meet each attendee's needs, we provide a number of different learning tools. These include well-researched and professionally prepared materials and presentations by skilled and experienced subject matter experts. Although you'll have a preferred style of learning, we hope you'll take advantage of *all* the tools we offer.
- ❖ **Make a note of this.** This workbook and related materials will enable you to take notes, and have access to needed information. Instead of trying to take notes word-for-word, it is recommended that you list key points for later memory jogging. We will try and ensure you have as much information as you need to lessen the need for lengthy notes.
- ❖ **Don't hesitate, participate.** The course will be more interesting and productive when everyone participates. If you don't understand something, there is a good chance someone else does not either, so do everyone a favor and ask questions. Additionally, don't hesitate to answer our questions and share your relevant knowledge and experience with all of us.
- ❖ **Take a break.** Everyone has a limit to how much they can sit still and absorb. So use the break, network, share ideas, and get some fresh air. You can help keep us running smoothly by coming back on time.
- ❖ **Join in with the group.** Stay enthusiastic and involved.
- ❖ **Attendance.** You must fully attend the course, and where applicable, pass a final exam for full credit and to receive a training certificate. Please do your best to be on time for class and try to be here for the entire course.
- ❖ **Cell phones, PDA's and iPad's.** In an effort to minimize disruptions to class, please turn off all cell phones and PDA's. If they are your only emergency contact, please set them to vibrate. iPad's may be used, but should be for note taking.

**Please note:** This course is conducted in English with instruction facilitated by verbal and written communications.



## **Course Structure**

The Regional Training Course is a 3 day course developed to provide an encompassing event surrounding current, trending and critical knowledge areas in Indian gaming. Providing full staff learning opportunities, as well as focus area learning tracks, the course is designed to give tribal gaming regulators and operations personnel, commissions and staff a wide variety of subject needs to meet concerns and relevant areas of interest in Indian gaming.

Each instruction topic is focused around identified concern areas, new content and regulations and a variety of mechanisms for change, improvement and compliance for success. Each block focuses on various staff roles and responsibilities, focusing on similarities, differences, and opportunities for collaboration and sharing of practices and improvements. Most topic areas will pair an equal amount of time to facilitated lecture and action based learning.

The primary training methodologies will be interactive lecture, small group discussion, and case study. Action based learning will be facilitated through small groups and case study. Final learning will be measured through exercise completion and observation.



# Regional Training Course Agenda



|                  |              | <b>PORTLAND REGIONAL TRAINING COURSE</b>  |  |
|------------------|--------------|---|--|
|                  |              | <b>June 6- 8, 2017</b><br><b>Sprit Mountain Casino</b><br><b>27100 Salmon River Hwy</b><br><b>Grand Ronde, OR 97347</b> |  |
| <b>Day One</b>   | <b>09:00</b> | Course Opening/Welcome  |  |
|                  | <b>09:15</b> | Regional Guidance on the Issues   |  |
|                  | <b>10:45</b> | The Power of Observation: What Pre-Criminal Behavior Looks Like Presented by Abe Martin                                 |  |
|                  | <b>12:00</b> | <i>Lunch (On Your Own)</i>  |  |
|                  | <b>1:00</b>  | Human Trafficking - BIA   |  |
|                  | <b>2:30</b>  | Active Shooter Training - FPS   |  |
|                  | <b>4:00</b>  | <b>Day Wrap up, Q&amp;A, Next Day Prep</b>  |  |
|                  |              | <b>DAY TWO- TRACKS</b>  |  |
| <b>Day Two</b>   | <b>9:00</b>  | Internal Audit: A to Z Approach   | QI E/326 Requirements of IGRA and Pitfalls of Non-Compliance |
|                  | <b>11:00</b> |   | How to Audit to 543.20                                       |
|                  | <b>12:00</b> | <i>Lunch (On Your Own)</i>  |  |
|                  | <b>1:00</b>  | Internal Audit: A to Z Approach   | How to Audit to 543.20                                       |
|                  | <b>2:00</b>  |   | How to Audit to 543.20                                       |
|                  | <b>3:00</b>  |   | QI E/325 Legal Opinions                                      |
|                  | <b>4:00</b>  | <b>Q&amp;A</b>  | <b>Q&amp;A</b>   |
|                  |              |   | <b>DAY THREE- TRACKS</b>                                     |
| <b>Day Three</b> | <b>9:00</b>  | Internal Audit: A to Z Approach   | Detecting Gamesmanship                                       |
|                  | <b>10:00</b> |   | Drop and Count   |
|                  | <b>11:00</b> |   |  |
|                  | <b>12:00</b> | <i>Lunch (On Your Own)</i>  |  |
|                  | <b>1:00</b>  | Internal Audit: A to Z Approach   | Drop and Count   |
|                  | <b>2:00</b>  |   | Auditing Revenue   |
|                  | <b>3:00</b>  |   |  |
|                  | <b>4:00</b>  | <b>Course Close</b>   |  |

