



# St. Paul

## 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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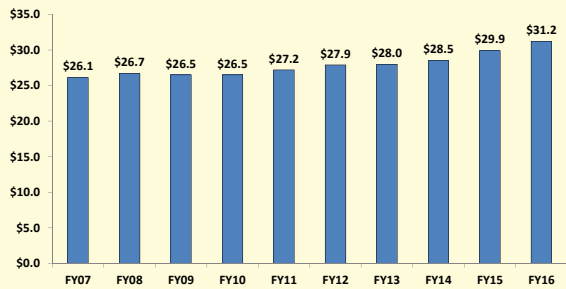
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## FY2016 GGR



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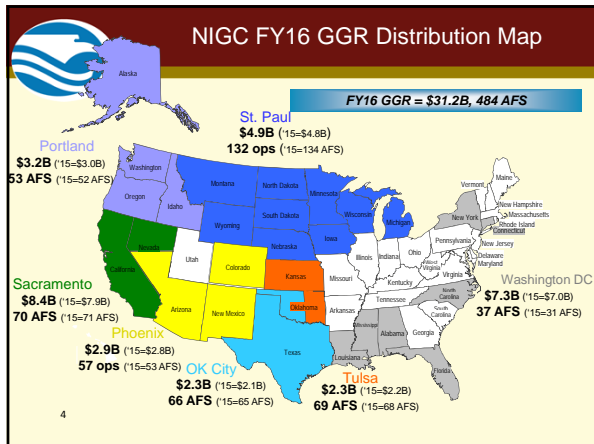
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### St. Paul Region

- **9 States – St Paul / RC satellite office**
- **Montana, Wyoming, North Dakota, South Dakota, Nebraska, Minnesota, Michigan, Wisconsin, Iowa**

59 Tribes – 144 gaming operations:

Class II	40
Class III (only)	36
Class II/III	68

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### St. Paul Region

- **Backgrounds & Licensing**

October 2015 to September 2016:

Fingerprints Processed – 14,669

NORs Received – 11,065

LIC Received – 9,764

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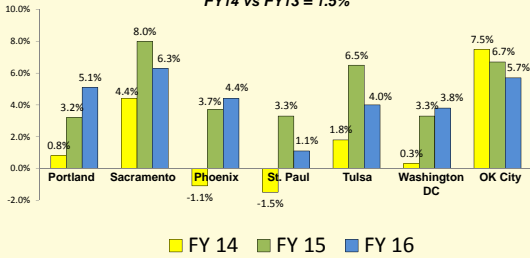
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## GGR Growth Rate By Region

**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

[Jennifer\\_Lawson@nigc.gov](mailto:Jennifer_Lawson@nigc.gov)

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## Office of General Counsel

### Issues around the Region:

- Lots of management contracts lately
  - Hiring new financial analyst to manage volume
- Reminder to review casino credit card policy and compliance regularly to avoid Use of Revenues issues

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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.njgc.gov>

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## Audit

- Internal Control Assessments
  - Limited Scope review of specific areas

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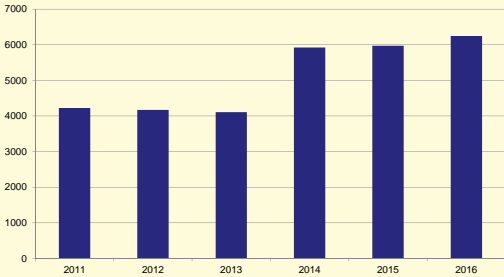
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## Overall MICS AUP Exceptions

MICS Exceptions for Indian Gaming



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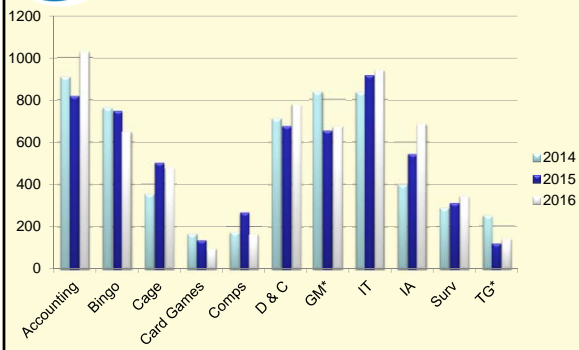
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## Breakdown by Section



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## 543 #5 Finding

- Audit and accounting 543.23(c)(8)
  - Internal audit
  - Controls established and procedures implemented
    - Follow-up performed to verify corrective action taken for all instances of non-compliance
    - Verification performed within 6 months following date of notification of non-compliance

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### 543 Tied #3 Finding

- Cage, Vault, Kiosk, Cash and Cash Equivalents 543.18(c)(4)
  - *Cage and Vault Accountability*
    - Gaming operation must establish and comply with a minimum bankroll formula to ensure cash or equivalents sufficient to satisfy obligations as they are incurred.

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### 543 Tied #3 Finding

- Complimentary Services or Items 543.13(d)
  - *Variations*
    - 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.

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### 543 #2 Finding

- Promotions and Player Tracking Systems 543.12(d)
  - *Variations*
    - 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.

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## 543 #1 Finding

- Auditing Revenue 543.24(d)(9)(iii)
  - Controls must be established and procedures implemented to audit of each of the following operational areas:
    - Cage, vault, cash and cash equivalents
      - Twice annually, a count must be performed of all funds in all gaming areas.

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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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## Questions




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## Course Evaluation

- Provide an honest assessment of your experience
- Written suggestions and comments are greatly appreciated 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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