

Supervision 543.24(a)

- Must be provided as needed for *bingo* operations
- Authority must be equal to or greater than those being supervised

Independence 543.24(b)

 Revenue audits must be performed by agent(s) *independent* of transactions being audited

Documentation 543.24(c)

- What needs to be documented and maintained?
 - Revenue audit procedures
 - Exceptions noted
 - Follow-up

Controls 543.24(d)

- Controls must be established and procedures implemented to audit of each of the following operational areas:
 - Bingo
 - Pull-tabs
 - Card games

 Complimentary services and items

- Gaming promotions and player tracking
- Patron deposit accountsLines of credit
- Drop and count
- Cage, Vault, cash and cash equivalents
- Inventory

Bingo 543.24(d)(1)

- Monthly, reconcile ending balance in bingo control log to bingo paper inventory

 Investigate and document any variances
- Daily reconcile supporting documents to summarized paperwork or electronic records
- Monthly, review variances of bingo accounting data in accordance with <u>established threshold</u>
 Investigate and document any variances

Bingo 543.24(d)(1)

- Monthly, review statistical reports for deviations from mathematical expectations exceeding threshold <u>established by TGRA</u>
 - Investigate and document deviations compared to mathematical expectations required to be submitted per 25 CFR Part 547.4
- Monthly, foot random sample of vouchers redeemed and trace totals to totals recorded in the voucher system and to cashier's accountability document

Pull Tabs 543.24(d)(2)

- Daily, verify the total amount of winning pull tabs redeemed
- Monthly, verify ending balance in pull tab control log to pull tabs inventory

 Investigate and document any variance
- Monthly, compare amount of pull tab sales on control log to actual pull tab sales
 Is it reasonable?

Pull Tabs 543.24(d)(2)

- Monthly, review statistical reports for any deviations <u>exceeding threshold</u>, as defined by <u>TGRA</u>
 - Investigate and document any large or unusual fluctuations noted

Card Games 543.24(d)(3)

- Daily, reconcile amount on progressive sign/meter
- Reconcile amount to the cash counted/ received by cage and payouts made for each promotional progressive pot and pool
 - Reconciliation must be documented and include reasons for differences and adjustments

Card Games 543.24(d)(3)

• Monthly, review all payouts for promotional progressive pots, pools, or other promotions

- Verify:
 - Payout accuracy - Proper accounting treatment

 - Conducted in accordance with conditions provided to patrons
- At conclusion of each contest, reconcile all contest/tournament entry and payout forms to amounts recorded in accountability document

Gaming Promotions and Player Tracking 543.24(d)(4)

- · Monthly, review promotional payments, drawings, and giveaway programs
 - Verify
 - ➢Payout accuracy
 - >Proper accounting treatment
 - >Conducted in accordance with rules provided to patrons

Gaming Promotions and Player Tracking 543.24(d)(4)

- Monthly, for computerized player tracking systems perform the following:
 - Review authorization documentation for all manual point additions/deletions for propriety
 - Review exception reports, including transfers between accounts
 - Review documentation related to access to inactive and closed accounts

Gaming Promotions and Player Tracking 543.24(d)(4)

- Annually, review of configuration parameters for accuracy and appropriate management authorization.
 - Review by agent(s) independent of those setting up or make changes to system parameters
 - Document and maintain test results

Complimentary Services or Items 543.24(d)(5)

- Monthly, review reports required in 25 CFR Part 543.13(d)
 - -Report documents review of variances exceeding threshold, approved by TGRA
- These reports must be made available to those entities authorized by the TGRA, Tribal law or Ordinance

Patron Deposit Accounts 543.24(d)(6)

- Weekly, reconcile patron deposit account liability to the system record
- Weekly, review manual increases and decreases to/from player deposit accounts for proper authorization

Lines of Credit 543.24(d)(7)(i)

- At least three times a year, agent(s) independent of cage, credit and collections must review:
 - -Select a sample of line of credit accounts
 - -Ascertain compliance with credit limits and other credit issuance procedures

Lines of Credit 543.24(d)(7)(i)

 Three times a year, independent agent(s) must review (Cont.):

 Reconcile outstanding balances of active and inactive accounts on accounts receivable listing to individual credit records and physical instruments

 \succ Once a year for inactive accounts

 Examine line of credit records for appropriate collection efforts and payments are being properly recorded

Lines of Credit 543.24(d)(7)(i)&(ii)

- Three times a year, independent agent(s) must review (Cont.):
 - At least 5 days during review period, reconcile partial payment receipts to total payments recorded by cage
 - For the day
 - Account for receipts numerically
- Monthly, perform evaluation of collection percentage of credit issued
 - To identify unusual trends

Drop and Count 543.24(d)(8)(i)

- Quarterly, test currency counter and currency counter interface
 - Unannounced tests
 - Test results documented, signed by agent and maintained
 - All denominations of currency and cash-out tickets counted by currency counter tested
 - May be performed by Internal Audit or TGRA

Drop and Count 543.24(d)(8)(ii)

- Quarterly, test weigh scale and weigh scale interface
 - Unannounced tests
 - Test results documented, signed by agent and maintained
 - May be performed by Internal Audit or TGRA

Drop and Count 543.24(d)(8)(iii)

- For computerized key security systems controlling access to drop and count keys perform the following:
 - Quarterly, review report indicating transactions performed by individual(s) who add, delete and change users' access within the system

Drop and Count 543.24(d)(8)(iii)

- For computerized key security systems (Cont.):
 - Quarterly, review report indicating all transactions performed for any unusual drop and count key removals or key returns Quarterly, review a sample of users assigned access to drop and count keys

Determine whether access to assigned keys is appropriate relative to their job position

Drop and Count 543.24(d)(8)(iv)

- For computerized key security systems (Cont.):
 - Quarterly, perform an inventory of all controlled keys and reconcile to records
 - >Records include keys made, issued and destroyed
 - Investigate any keys unaccounted for
 - >Document investigations



- Monthly, reconcile cage accountability to general ledger
- Monthly, trace amounts on cage deposits to amounts in bank statements

Cage, Vault, Cash and Cash Equivalents 543.24(d)(9)(iii)

- Twice annually, count all funds in all gaming areas, kiosks, cash-out ticket redemption machines and change machines
 - Count all chips, tokens by denomination and type
 - Count individual straps, bags and imprest banks on a sample basis
 - Reconcile all amounts counted to amounts recorded on accountability forms to ensure proper recording

Cage, Vault, Cash and Cash Equivalents 543.24(d)(9)(iii)

- Twice annual Count (cont.)
 - Count must be completed within same gaming day
 - Documentation evidencing the amount counted and comparison to accountability forms maintained
 - Counts must be observed by an individual independent of the department being counted The individual responsible for the funds may perform
 - actual count while being observed >Internal audit may perform and/or observe counts

Cage, Vault, Cash and Cash Equivalents 543.24(d)(9)(iv) & (v)

- At least annually, select a sample to trace the dollar amount from the purchase invoice to the accountability document that indicates the increase to the chip or token inventory
- At fiscal year end, create and maintain documentation evidencing amount of chip/token liability from the previous year and explanations for adjustments to the liability account, including adjustments for chip/token float

Cage, Vault, Cash and Cash Equivalents 543.24(d)(9)

- Monthly, review sample of returned checks to determine required information was recorded at the time check was accepted
- Monthly, review exception reports for all computerized cage systems for propriety of transactions and unusual occurrences
- Daily, reconcile all parts of forms used to document increases/decreases to total cage inventory,
 - Investigate and document variances

Cage, Vault, Cash and Cash Equivalents 543.24(d)(10)

- Monthly, verify receipt, issuance and use of controlled inventory
 - Including, but not limited to, bingo cards, pull tabs, playing cards, keys, pre-numbered and/or multi-part forms
- Periodically, perform minimum bankroll calculations to confirm that sufficient cash is maintained





Knowledge Review

- Be sure to include your name and email address
- Do your best
- Be on the lookout for the survey email 90 days from today

QUESTIONS
1- (A)B C D
2- A B C D
3- ABCD
4- ABC D
5- A B C D
6- (A) B C D

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