



Tulsa: Regional Guidance on the Issues

Panel Discussion

July 18, 2017



Commission's Initiatives

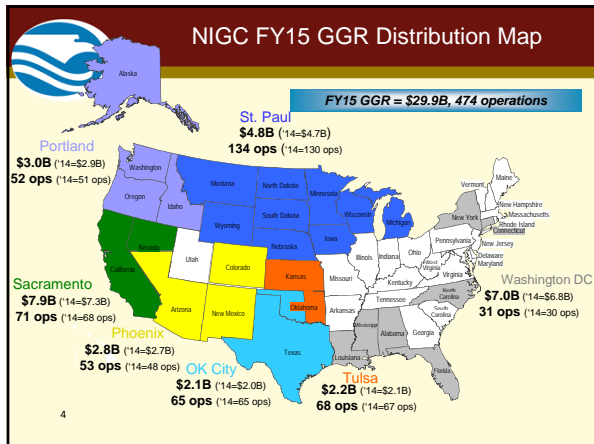
- Rural Outreach
- Staying ahead of the Technology Curve
- Supporting a strong workforce both in-house and among our regulatory partners
- Protect against anything that amounts to gamesmanship on the back of tribes



FY2015 GGR

FY15: Indian gaming industry's largest year-over-year GGR increase during past 10 years.





Tulsa Region

- **Eastern Oklahoma, Kansas**
- 18 Tribes-Operating 71 gaming facilities:

Class II (only)	2
Class III (only)	2
Class II and III	67

Tulsa Region


Backgrounds & Licensing

October 2015 to September 2016

- Fingerprints Processed – 6,874
- NORs Received – 4,527
- NGLI Received – 1,936

October 2016 to May 2017

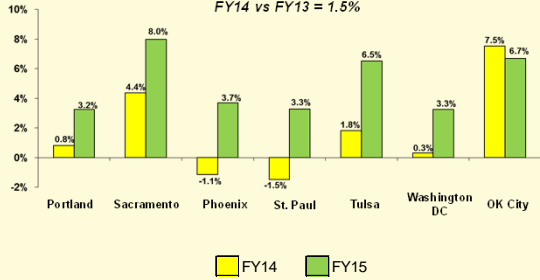
- Fingerprints Processed – 4,703
- NORs Received – 3,193
- NGLI Received – 1,347





GGR Growth Rate By Region

Overall Growth Rate
FY15 vs FY14 = 5.0%
FY14 vs FY13 = 1.5%



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Regional Compliance Issues/Guidance

ISSUE:

- Submission of NOR/NGLI
- KE/PMO Licensing Concurrence Letters
- Submission of AFS, Fees & Worksheets
- FBI MOU – CHRI
- 547 Grandfathered Games

GUIDANCE:

- Timeframes – Due dates
- Electronic – email notification
- Timeframes – Due dates
- Privacy Act Notification
- NIGC Website – comment period



Office of General Counsel

Requesting OGC Opinions:

- Indian Lands
- Game Opinions
- Declination Letters

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Office of General Counsel

OGC Technical Assistance

- Informal Gaming Ordinance Review
- Regional Training Courses
- Other Questions or Concerns



Office of General Counsel

Facility License Notifications & Submissions

- Part 559
- Notify NIGC 120 days before opening
- Common Items Missing:
 - Name of the facility
 - Address
 - Deed
 - Tract Number

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Office of General Counsel

Gaming Ordinances

- **Part 522**
- **Model Gaming Ordinance (online)**
- **Common Items Missing:**
 - Copies of the tribal gaming regulations
 - A copy of the tribal-state compact/Secretarial Procedures
 - Procedures to resolve disputes
 - Identification of a law enforcement agency that will take fingerprints
 - Privacy Act Notice
 - Parts 556 & 558

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Office of General Counsel

Potential Issues:

1. What constitutes "management"?
2. Sole Proprietary Interest
3. Uses of Gaming Revenue

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Technology Division

ITVA's 2016

Requests – 1
Completed - 0

Common ITVA Issues

Identified

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

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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2016 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

2016 IT General Interactions

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



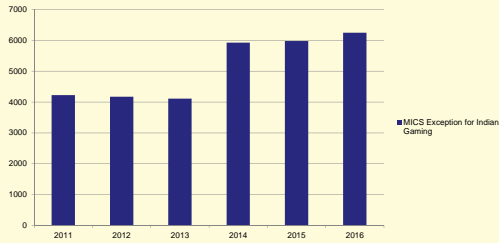
Audit

- Internal Control Assessments
 - Limited Scope review of specific areas



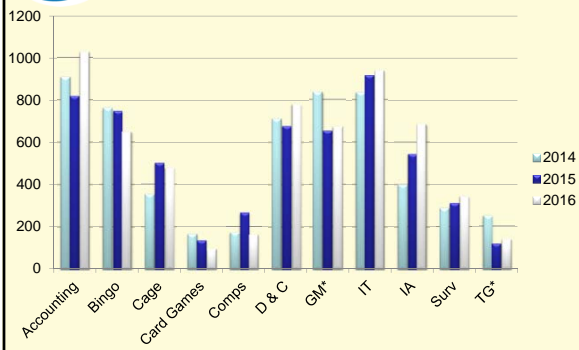
Overall MICS AUP Exceptions

MICS Exceptions for Indian Gaming





Breakdown by Section





543 Tied #5 Finding

- Audit and accounting 543.23(c)(4)
 - Internal audit
 - Controls established and procedures implemented
 - Internal auditor(s) are independent of gaming operations with respect to departments subject to audit (auditors internal to the operation, officers of the TGRA, or outside CPA firm may perform this function)



543 #5 Finding

- Auditing Revenue 543.24(d)(8)(iv)
 - Establish controls and implement procedures:
 - Drop and Count
 - Quarterly, inventory all controlled keys and reconcile to records of keys made, issued, and destroyed
 - Investigate all keys unaccounted for, and document investigation

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543 Tied #2 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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543 Tied #2 Finding

- Auditing Revenue 543.24(d)(4)(ii)(A)
 - Establish controls and implement procedures to audit the following operational area:
 - Gaming Promos and Player Tracking
 - At least monthly, for computerized player tracking systems, perform the following procedures:
 - Review authorization documentation for all manual point additions/deletions for propriety



543 Tied #1 Finding

- Auditing Revenue 543.24(d)(4)(ii)(B)
 - Establish controls and implement procedures to audit the following operational area:
 - Gaming Promos and Player Tracking
 - At least monthly, for computerized player tracking systems, perform the following:
 - Review exception reports, including transfers between accounts



543 Tied #1 Finding

- Promotions and Player Tracking Systems 543.12(d)
 - *Variances*
 - 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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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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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





Course Evaluation

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



Course Eval - Regional Guidance
To complete the survey, go to PollEv.com/nigc

Start the presentation to activate live content
If you see this message in presentation mode, install the pds-in or get help at PollEv.com/app

© 0 surveys underway
