

***§542.12 What are the minimum internal control standards for table games?***

(a) *Computer applications.* For any computer applications utilized, alternate documentation and/or procedures that provide at least the level of control described by the standards in this section, as approved by the Tribal gaming regulatory authority **in writing**, will be acceptable.

(b) *Standards for drop and count.* The procedures for the collection of the table game drop and the count thereof shall comply with §542.21, §542.31, or §542.41 (as applicable).

(c) *Fill and credit standards.* (1) Fill slips and credit slips shall be in at least triplicate form, and in a continuous, prenumbered series. Such slips shall be concurrently numbered in a form utilizing the alphabet and only in one series at a time. The alphabet need not be used if the numerical series is not repeated during the business year.

(2) **Manual unissued** ~~Unissued~~ and issued fill/credit slips shall be safeguarded and adequate procedures shall be employed in their distribution, use, and control. Personnel from the ~~cashier~~ **cage** or ~~pit~~ **table games** departments shall have no access to the ~~secured~~ **locked box** (control) copies of the fill/credit slips. **For computerized systems, one part shall be stored in the computer system in such manner that prevents pit, cage and other unauthorized persons from accessing and making changes to the stored information.**

**Comment** (January): Please provide clarification of the “lock box” reference in this section.

**Response:** The “locked box” copies refer to the control copies that are maintained in what is commonly referred to as a “whiz machine”.

**Comment** (January): If the “locked box” was referred to as a whiz machine in the Cage (542.14) section, parenthetically or otherwise, the same reference should be included in this section.

**Response:** There is no reference to a whiz machine in the Cage 542.14 Section. However, to clarify, the reference will be changed to “locked (whiz) machine”. Modified accordingly.

*Proposed revision as a result of January comment:*

(2) **Manual unissued** ~~Unissued~~ and issued fill/credit slips shall be safeguarded and adequate procedures shall be employed in their distribution, use, and control. Personnel from the ~~cashier~~ **cage** or pit departments shall have no access to the ~~secured~~ **locked (whiz) machine** (control) copies of the fill/credit slips. **For computerized systems, one part shall be stored in the computer system in such manner that prevents pit, cage and other unauthorized persons from accessing and making changes to the stored information.**

**Comment** (January): Please provide clarification on the risk that is being mitigated in the proposed language. This language may need to be moved to a subsection as it does not appear to fit within the category of a manual function.

**Response:** The intent of the proposed language is to clarify that the control copy of the slip need not be a hard copy; it may be a computerized copy.

**Comment** (March): As previously recommended, reference to “pit department” should be changed to “table games department.”

**Response:** Agreed. Modified accordingly.

*Proposed revision as a result of March comment:*

(2) **Manual unissued** ~~Unissued~~ and issued fill/credit slips shall be safeguarded and adequate procedures shall be employed in their distribution, use, and control. Personnel from the ~~cashier~~ **cage** or ~~pit~~ **table games** departments shall have no access to the ~~secured~~ **locked (whiz) machine** (control) copies of the fill/credit slips. **For computerized systems, one part shall be stored in the computer system in such**

manner that prevents table games, cage and other unauthorized persons from accessing and making changes to the stored information.

(3) When a fill/credit slip is voided, the cashier shall clearly mark “void” across the face of the original and first copy, the cashier and one other person ~~independent of performing~~ the ~~transactions void~~ shall sign both the original and first copy, and shall submit them to the accounting department for retention and accountability. For computer-generated fill/credit slips, the computer system shall be updated to reflect the voided fill/credit transaction.

**Comment** (January): Please insert the words “by authorized personnel” after the word “updated” to allow for a control of voids in a computerized system. It is our understanding that the computerized system, tribal internal controls, and gaming operation SOPs will dictate which authorized personnel will be able to perform this function.

**Response:** Agreed. Modified accordingly. Note: Following a lengthy discussion, it appeared that the concern revolved around which personnel were or should be authorized to verify the void rather than which personnel were or should be authorized to update the computer system.

*Proposed revision as a result of January comment:*

(3) When a fill/credit slip is voided, the cashier shall clearly mark “void” across the face of the original and first copy, the cashier and one other person ~~independent of performing~~ the ~~transactions void~~ shall sign both the original and first copy, and shall submit them to the accounting department for retention and accountability. For computer-generated fill/credit slips, the computer system shall be updated by authorized personnel to reflect the voided fill/credit transaction.

(4) Fill/credit transactions shall be authorized by ~~pit~~ table games supervisory personnel before the issuance of fill/credit slips and transfer of chips, tokens, or cash equivalents.

~~The fill request shall be communicated to the cage where the fill slip is prepared.~~

**Comment** (January): Please provide clarification of the words “the issuance of”.

**Response:** Generation of the fill or credit “slip”

**(5) Unless the chips, tokens, and/or monetary equivalents (e.g., credit instruments, coin) being transferred from the tables to the cage are accompanied by a credit slip, an order for credit shall be prepared to accompany the inventory being transferred from the pit to the cashier area or other secure area of accountability.**

**Comment** (January): Is this section referring to a manual credit, fill request, etc? Please clarify. If this is a manual process then that needs to be articulated so as to avoid any confusion.

**Response:** This could refer to either an electronic or a manual system. However, with the electronic there is not need to produce a physical document.

**(i) When an order for credit is prepared to accompany the chips, tokens, and/or monetary equivalents transferred, the duplicate copy of the order for credit shall be retained in the pit to compare to the credit slip for proper entries and to document the total amount of chips, tokens, and/or equivalents removed from the table.**

**(ii)[Reserved].**

**(5) (6)** At least three parts of each fill/credit slip shall be utilized as follows:

**(i) ~~One part shall be transported to the pit with the fill and, after the appropriate signatures are obtained, deposited in the table game drop box; For a fill, one part shall be transported to the pit with the chips, tokens, and/or monetary equivalents and, after the appropriate signatures are obtained, deposited in table game drop box. For a credit, one part shall be transported to the pit by the runner who~~**

**brought the chips, tokens, and/or monetary equivalents from the pit to the cage, and after the appropriate signatures are obtained, deposited in the table game drop box.**

**Comment** (January): It is our opinion that this section needs to be separated out so as to distinguish “fills” from “credits” for readability.

**Response:** Agreed. Modified accordingly.

*Proposed revision as a result of January comment:*

**(5) (6)** At least three parts of each ~~fill~~ slip shall be utilized as follows:

**(i) ~~One part shall be transported to the pit with the fill and, after the appropriate signatures are obtained, deposited in the table game drop box;~~ For fill slips-**

**(A) One part shall be transported from the cage to the pit with the chips, tokens, and/or monetary equivalents and, after the appropriate signatures are obtained, deposited in table game drop box.**

**(B) (ii)** One part shall be retained in the cage for reconciliation of the cashier bank; and

**(C) (iii)** For computer systems, one part shall be stored in the computer system ~~retained in a secure manner to insure that only authorized persons may gain access to it.~~ For manual systems, one part shall be retained ~~in a secure manner~~ intact by the locked machine in a continuous unbroken form.

**(ii) For credit slips-**

**(A) One part shall be transported to the pit by the runner who brought the chips, tokens, and/or monetary equivalents from the pit to the cage, and after the appropriate signatures are obtained, deposited in the table game drop box.**

**(B) One part shall be retained in the cage for reconciliation of the cashier bank; and**

**(C) For computer systems, one part shall be stored in the computer system. For manual systems, one part shall be retained intact by the locked machine in a continuous unbroken form.**

**Comment** (January): Please provide clarification on the words “locked machine”.

**Response:** “Locked machine” refers to the “whiz machine” referenced in (c) (2). References in (6) (i) (C) and (6) (ii) (C) modified for consistency with reference in (c) (2)

*Proposed revision as a result of January comment:*

**(5) (6)** At least three parts of each ~~fill~~ slip shall be utilized as follows:

**(i) One part shall be transported to the pit with the fill and, after the appropriate signatures are obtained, deposited in the table game drop box; For fill slips-**

**(A) One part shall be transported from the cage to the pit with the chips, tokens, and/or monetary equivalents and, after the appropriate signatures are obtained, deposited in table game drop box.**

**(B) (ii)** One part shall be retained in the cage for reconciliation of the cashier bank; and

**(C) (iii)** For computer systems, one part shall be **stored in the computer system** ~~retained in a secure manner to insure that only authorized persons may gain access to it.~~ For manual systems, one part shall be retained ~~in a secure manner~~ **intact by the locked (whiz) machine** in a continuous unbroken form.

**(ii) For credit slips-**

**(A) One part shall be transported to the pit by the runner who brought the chips, tokens, and/or monetary equivalents from the pit to the cage, and after the appropriate signatures are obtained, deposited in the table game drop box.**

**(B) One part shall be retained in the cage for reconciliation of the cashier bank; and**

**(C) For computer systems, one part shall be stored in the computer system. For manual systems, one part shall be retained intact by the locked (whiz) machine in a continuous unbroken form.**

~~(6)~~ **(7)** For Tier C gaming operations, the part of the fill/**credit** slip that is placed in the table game drop box shall be of a different color for fills than for credits, unless the type of transaction is clearly distinguishable in another manner (the checking of a box on the form shall not be a clearly distinguishable indicator).

**Comment** (January): It is our recommendation that the reference to “Tier C” be removed and this control be revised to reflect that that fill/credit slips shall be distinguishable from one another. The manner in which the gaming operation and the TGRA choose to distinguish these forms is a local regulatory matter.

**Response:** Disagree. Limiting the requirement to Tier C gaming operations does not preclude the TGRA from imposing the same requirement on Tier A or B gaming operations.

~~(7)~~ **(8)** The table number, shift, and amount of fill/**credit** by denomination and in total shall be noted on all copies of the fill/**credit** slip. ~~The~~ **For manual slips, the** correct date and time shall be indicated on at least two copies. **For a computerized system, all copies must include the date and time.**

**Note:** Numbering has been corrected.

**(i) If the credit slip (manual or computerized) is for the transfer of a marker to the cage at the time other than for a mass marker transfer, the slip and order for credit (if utilized) must also include the marker number(s), customer’s name, amount of each marker(s), the total amount transferred, signature of table games supervisor releasing the instrument from the pit, and the signature of the cashier verifying receipt of the instrument at the cage; and**

**(ii) A credit slip is not required when completing a mass marker transfer. Credit slip(s) are only required for credit instruments transferred from the pit to the cage when a mass marker transfer form is not used.**

**(8) (9)** All fills/**credits** shall be carried **to**/from the cashier's cage by a person who is independent of the cage ~~or pit~~ **and table games departments.**

**(9) (10)** The fill/**credit** slip shall be signed by at least the following persons (as an indication that each has counted the amount of the fill/**credit** and the amount agrees with the fill/**credit** slip **or, in the case of markers, reviewed the items transferred**):

(i) Cashier who prepared the fill slip and issued the chips, tokens, or cash equivalent, **or prepared the credit slip and received the chips, tokens, and/or monetary equivalents transferred from the pit;**

(ii) Runner who carried the chips, tokens, or cash equivalents from the cage to the pit, **or carried the chips, tokens, and/or monetary equivalents transferred from the pit to the cage and returned to the pit with the credit slip;**

(iii) Dealer or boxperson who received the chips, tokens, or cash equivalents at the gaming table, **or had custody of the chips, tokens, and/or monetary equivalents prior to transfer to the cage. For marker credits, the dealer inserting the credit slip into the table game drop box;** and

**Comment** (January): Use of the words “had custody of” is peculiar. Recommend using some other expression.

**Response:** Agreed. Modified accordingly.

*Proposed revision as a result of January comment:*

(iii) Dealer or boxperson who received the chips, tokens, or cash equivalents at the gaming table, **or relinquished the chips, tokens, and/or monetary equivalents for**

transfer to the cage. For marker credits, the dealer inserting the credit slip into the table game drop box; and

(iv) ~~Pit~~ Table games supervisory personnel who supervised the fill/credit transaction.

~~(10)~~ (11) Fills/credits shall be broken down and verified by the dealer or boxperson in public view before the dealer or boxperson places the fill in the table tray or prior to placing them in racks for transfer to the cage, as applicable.

~~(11)~~ (12) A copy of the fill/credit slip shall then be deposited into the drop box on the table by the dealer, where it shall appear in the soft count room with the cash receipts for the shift.

~~(12) Table credit transactions shall be authorized by a pit supervisor before the issuance of credit slips and transfer of chips, tokens, or other cash equivalent. The credit request shall be communicated to the cage where the credit slip is prepared.~~

~~(13) At least three parts of each credit slip shall be utilized as follows:~~

~~(i) Two parts of the credit slip shall be transported by the runner to the pit. After signatures of the runner, dealer, and pit supervisor are obtained, one copy shall be deposited in the table game drop box and the original shall accompany transport of the chips, tokens, markers, or cash equivalents from the pit to the cage for verification and signature of the cashier.~~

~~(ii) For computer systems, one part shall be retained in a secure manner to insure that only authorized persons may gain access to it. For manual systems, one part shall be retained in a secure manner in a continuous unbroken form.~~

~~(14) The table number, shift, and the amount of credit by denomination and in total shall be noted on all copies of the credit slip. The correct date and time shall be indicated on at least two copies.~~

~~(15) Chips, tokens, and/or cash equivalents shall be removed from the table tray by the dealer or boxperson and shall be broken down and verified by the dealer or boxperson in public view prior to placing them in racks for transfer to the cage.~~

~~(16) All chips, tokens, and cash equivalents removed from the tables and markers removed from the pit shall be carried to the cashier's cage by a person who is independent of the cage or pit.~~

~~(17) The credit slip shall be signed by at least the following persons (as an indication that each has counted or, in the case of markers, reviewed the items transferred):~~

~~(i) Cashier who received the items transferred from the pit and prepared the credit slip;~~

~~(ii) Runner who carried the items transferred from the pit to the cage;~~

~~(iii) Dealer who had custody of the items prior to transfer to the cage; and~~

~~(iv) Pit supervisory personnel who supervised the credit transaction.~~

~~(18) The credit slip shall be inserted in the drop box by the dealer.~~

~~(19)~~ (13) Chips, tokens, or other cash equivalents shall be deposited on or removed from gaming tables only when accompanied by the appropriate fill/credit or marker transfer forms.

~~(20)~~ (14) Cross fills (the transfer of chips between table games) and even cash exchanges are prohibited in the pit.

**Justification:** Revisions are intended to better differentiate the controls pertaining to a computerized fill/credit system, to consolidate the fill and credit standards, and to recognize that the transfer of markers may also be handled as a credit transaction.

(d) *Table inventory forms.* (1) At the close of each shift, for those table banks that were opened during that shift:

**Comment** (January): We recommend adding language that would inform personnel that these controls will apply any time a game is closed during a shift by the gaming operation or at the close of each shift.

**Response:** Disagree. The procedures are performed at the close of each shift for all tables that were open during the shift, regardless of when they closed.

(i) The table's chip, token, coin, and marker inventory shall be counted and recorded on a table inventory form; or

(ii) If the table banks are maintained on an imprest basis, a final fill or credit shall be made to bring the bank back to par.

(2) If final fills are not made, beginning and ending inventories shall be recorded on the master game sheet for shift win calculation purposes.

**Comment** (January): We recommend adding the words “on an imprest” basis after the word “made”.

**Response:** Final fills are not relevant to a floating bank. Agree to modify wording for clarity.

*Proposed revision as a result of January comment:*

(2) If ~~final fills are not made~~ **the table banks are not maintained on an imprest basis,** beginning and ending inventories shall be recorded on the master game sheet for shift win calculation purposes.

(3) The accuracy of inventory forms prepared at shift end shall be verified by the outgoing ~~pit~~ **table games** supervisor and the dealer. Alternatively, if the dealer is not available, such verification may be provided by another ~~pit~~ **table games** supervisor or

another supervisor from another gaming department. Verifications shall be evidenced by signature on the inventory form.

(4) If inventory forms are placed in the drop box, such action shall be performed by a person other than a ~~pit~~ **table games** supervisor.

(e) *Table games computer generated documentation standards.* (1) The computer system shall be capable of generating adequate documentation of all information recorded on the source documents and transaction detail (e.g., fill/credit slips, markers, etc.).

(2) This documentation shall be restricted to authorized personnel.

(3) The documentation shall include, at a minimum:

(i) System exception information (e.g., appropriate system parameter information, corrections, voids, etc.); and

(ii) Personnel access listing, which includes, at a minimum:

(A) Employee name or employee identification number (if applicable); and

(B) Listing of functions employees can perform or equivalent means of identifying the same.

(f) *Standards for playing cards and dice.* (1) ~~Playing~~ **New and used playing** cards and dice **to be issued to a table** shall be maintained in a secure location to prevent unauthorized access and to reduce the possibility of tampering.

(2) Used cards and dice **that are not to be reused** shall be ~~maintained in a secure location until~~ **promptly** marked, scored, or destroyed, **and removed from service in a manner as approved by the Tribal gaming regulatory authority, to prevent unauthorized access and reduce the possibility of tampering.**

**Comment** (January): What does “promptly” mean. Prone to multiple interpretations.

**Response:** Agree. Modified to provide clarity.

**Comment** (January): Recommend reinstating requirement to maintain cards in a secured location until marked, scored or destroyed.

**Response:** Agree. Modified accordingly

**Comment** (January): Aren't cards removed from service prior to being marked, scored or destroyed?

**Response:** Agree. Modified accordingly.

*Proposed revision as a result of January comments:*

(2) Used cards and dice **that are not to be reused** shall be maintained in a secure location until **promptly** marked, scored, or destroyed. **Unless otherwise defined by Tribal gaming regulatory authority, promptly is a period not to exceed seven (7) days.** ~~in a manner as approved by the Tribal gaming regulatory authority, to prevent unauthorized access and reduce the possibility of tampering.~~

~~(3) The Tribal gaming regulatory authority, or the gaming operation as approved by the Tribal gaming regulatory authority, shall establish and the gaming operation shall comply with a reasonable time period, which shall not exceed seven (7) days, within which to mark, cancel, or destroy cards and dice from play.~~

(i) This standard shall not apply where playing cards or dice are retained for an investigation.

(ii) [Reserved]

(4) A card control log shall be maintained that documents when cards and dice are received on site, distributed to and returned from tables and removed from play by the gaming operation.

**Justification:** Revision is intended to recognize that the control is effective only when the cards being removed from play are promptly cancelled or destroyed. Additionally, revision recognizes that used cards, as management may deem appropriate, may be injected back into play.

~~(g) Plastic cards. Notwithstanding paragraph (f) of this section, if a gaming operation uses plastic cards (not plastic-coated cards), the cards may be used for up to three (3) months if the plastic cards are routinely inspected, and washed or cleaned in a manner and time frame approved by the Tribal gaming regulatory authority.~~

**Justification:** Proposed revisions to (f) make the need for plastic card controls unwarranted.

~~(h) (g) Standards for supervision. Pit Table games~~ supervisory personnel (with authority equal to or greater than those being supervised) shall provide supervision of all table games.

~~(i) (h) Analysis of table game performance standards. (1) Records shall be maintained by day and shift indicating any single-deck blackjack games that were dealt for an entire shift.~~

~~(2) (1) Records reflecting hold percentage by table and type of game shall be maintained by shift, by day, cumulative month-to-date, and cumulative year-to-date. A table game statistical analysis report reflecting statistical drop [drop (+) pit credit issues (-) pit credit payments in cash], statistical win [table game gross revenue (+) marker credits] and statistical win to statistical drop hold percentage by table and type of game shall be maintained by shift, by day, cumulative month-to-date, and cumulative year-to-date. Promotional activity is not required to be tracked and included in the report.~~

**Comment** (January): Are definitions for statistical drop and statistical win included in §542.2?

**Response:** Yes.

~~(3)~~ **(2)** This information shall be presented to and reviewed by management independent of the pit department on at least a monthly basis. **At a minimum, the review shall consist of the following:**

**Comment** (March): As previously recommended, reference to “pit department” should be changed to “table games department.”

**Response:** Agreed. Modified accordingly throughout 542.12.

*Proposed revision as a result of March comment:*

~~(3)~~ **(2)** This information shall be presented to and reviewed by management independent of the ~~pit~~ **table games** department on at least a monthly basis. **At a minimum, the review shall consist of the following:**

**(i) Examination of the information for clerical errors;**

**(ii) Comparison of the statistical results with the base level statistical performance.**

**Base level is defined as either the statistical win to statistical drop hold percentage for the most recent calendar year or fiscal year, or a rolling average statistical win to statistical drop percentage for the immediately preceding 12 months.**

~~(4)~~ **(3)** ~~The management in paragraph (i) (3) of this section shall investigate any unusual fluctuations in hold percentage with pit supervisory personnel. (Revised May 4, 2005)~~ **On a monthly basis, management shall investigate all statistical fluctuations by game type from the base level for the month in excess of (+/-) 5%. The investigation shall be completed no later than 30 days after the generation of the month-end table games analysis report and include information from the pit**

department, accounting department, surveillance department, cage and credit department, and any other relevant department. The report will generally include an analysis of the following:

**Note:** It was specifically noted that although table game statistical analysis reports are required to be maintained by table and by game type, investigation need only be conducted of fluctuations by game type of +/- 5%.

**Comment** (January): Recommend inserting “may” before “include”.

**Response:** Agree. Modified accordingly.

**Comment** (January): Recommend replacing “pit department” with “table games department”.

**Response:** Agree. Modified accordingly.

*Proposed revision as a result of January comments:*

~~(4) (3) The management in paragraph (i) (3) of this section shall investigate any unusual fluctuations in hold percentage with pit supervisory personnel. (Revised May 4, 2005)~~ On a monthly basis, management shall investigate all statistical fluctuations by game type from the base level for the month in excess of (+/-) 5%. The investigation shall be completed no later than 30 days after the generation of the month-end table games analysis report and may include information from the table games department, accounting department, surveillance department, cage and credit department, and any other relevant department. The report will generally include an analysis of the following:

(i) Drop, win and credit activity of customers whose play materially affected the results for the month including the amount of pit credit issued, amount of pit credit

paid in cash at the table, the amount of drop from the customer and resulting win/loss from the customer;

(ii) Effect of any changes to the rules, types of wagers or game play procedures made to accommodate the wagering activity of any customers;

(iii) Effect of any free play or promotional activity utilized during the month;

(iv) Effect of errors or mistakes made during the operation of the game during the month;

(v) Any other unusual occurrences during the month being reviewed.

**Note:** Numbering corrected.

(4) The results of such investigations shall be documented, maintained for inspection, and provided to the Tribal gaming regulatory authority upon request.

**Justification:** Revision is proposing to strike the controls specific to a hand dealt game since they are no longer warranted. Revision is proposing statistical tracking procedures considered to be more effective in the monitoring of game performance.

*542.12 (i) Accounting/auditing standards has been moved to proposed Revenue Audit 542.50 (e).*

~~(i) Accounting/auditing standards. (1) The accounting and auditing procedures shall be performed by personnel who are independent of the transactions being audited/accounted for.~~

~~(2) For computerized player tracking systems, an accounting/audit employee shall perform the following procedures for at least one day per quarter:~~

~~(i) Review all point addition/deletion authorization documentation, other than for point additions/deletions made through an automated process, for propriety;~~

~~(ii) Review exception reports including transfers between accounts; and~~

~~Comment (January): Recommend inserting the word “point” after “including.”~~

~~Response: Agree. Modified accordingly.~~

~~Proposed revision as a result of January comment:~~

~~(ii) Review exception reports including point transfers between accounts; and~~

~~(iii) Review documentation related to access to inactive and closed accounts.~~

~~(3) At least annually, the computerized table game player tracking system shall be reviewed by personnel independent of the individuals that set up or make changes to the system parameters. The review is performed to determine that the configuration parameters are accurate and have not been altered without appropriate management authorization (e.g., verify the accuracy of the awarding of points based on the dollar amount wagered). The system should also be tested, if possible, to further verify the accuracy of the configuration parameters (e.g., simulate activity to verify the accuracy of the amount of points awarded). The test results shall be documented and maintained for Tribal gaming regulatory authority review upon request.~~

~~Comment (January): Typically, this is a function not accessible to Table Games personnel. This is an IT function. Should this not appear in the IT section?~~

~~Response: Disagree. Typically this function would be performed by Internal Audit or Revenue Audit.~~

~~(4) The following procedures shall be performed on fill/credit slips and marker credit slips by accounting/audit personnel:~~

~~(i) For manual fill/credit slips and manual marker credit slips, for at least one day per month, reconcile the original slip (placed in the table game drop box) to the~~

restricted copy to verify that the dollar amount of the transaction is the same on both parts of the slip.

(ii) For manual fill/credit slips and manual marker credit slips, for at least one day per month, verify that all numerically numbered slips issued are properly accounted for. Investigations shall be performed for all slips that are unaccounted for with the investigation being documented and retained for Tribal gaming regulatory authority review upon request.

(iii) For at least one day per month, foot (add up) the original slips (placed in the table game drop box) and trace the total to the total fill/credit and marker credit amounts indicated on the master game summary prepared by the count team members. If the reconciliation results in a variance, an investigation shall be performed to determine whether all forms are accounted for with the investigation being documented and retained for Tribal gaming regulatory authority review upon request.

(iv) For each day, examine a sample of slips for propriety of signatures and proper completion.

(5) The following procedures shall be performed on marker issue/payment slips by accounting/audit personnel:

(i) For manual marker issue slips, for at least one day each month, verify that all numerically numbered slips are properly accounted for. Investigations shall be performed for all slips that are unaccounted for with the investigation being documented and retained for Tribal gaming regulatory authority review upon request.

~~(ii) For at least one day per month, foot (add up) the marker issue and payment slips (placed in the table game drop box) and trace the total to the total marker issue and payment amounts indicated on the master games summary prepared by the count team members. If the reconciliation results in a variance, an investigation shall be performed to determine whether all forms are accounted for with the investigation being documented and retained for Tribal gaming regulatory authority review upon request.~~

~~(iii) For each day, examine a sample of marker issue and payment slips for propriety of signatures and proper completion.~~

~~(iv) If count team members only totaled marker issue and payment slips by shift and traced to the totals documented by the computer system, for each day, verify that the issue/payment slips for each table are accurate.~~

~~(6) For each day, accounting/audit personnel shall reconcile the total dollar amount of markers transferred as indicated on the mass marker transfer form(s) and marker credit slips to the dollar amount recorded on the cage accountability documentation. The mass marker transfer form shall be reviewed for propriety of signatures and proper completion.~~

~~(7) The following procedures shall be performed on voided markers and voided fill/credit slips by accounting/audit personnel (accounting/audit department employees who are soft count team members may perform) after the soft count process for each day:~~

~~(i) Examine all voided forms for proper authorization and “void” designation;~~

~~(ii) For fill/credit and marker computer systems, trace the voided form to computer system report(s) reflecting void activity;~~

~~(iii) For fill/credit and marker computer systems, examine the computer system report(s) reflecting void activity for void transactions that are not supported by a voided form.~~

~~(iv) Determine that all parts of the voided form have been received.~~

Comment (January): Is (iv) above referring to receipt by Accounting?

Response: Yes.

~~(v) Examine form for the proper number of signatures.~~

~~(vi) For all voided markers, determine that the void of the pit marker was not performed by cage personnel and compare the time of marker issuance to the time of voiding to determine that transactions were voided within 30 minutes after the issuance of the marker. If not voided within 30 minutes, determine whether the documented reason for exceeding the time period is adequate.~~

~~(8) The following procedures shall be performed on rim credit cards by accounting/audit personnel each day:~~

~~(i) Verify that all numerically numbered rim cards are properly accounted for. Investigations shall be performed for all forms that are unaccounted for with the investigation being documented and retained for Tribal gaming regulatory authority review upon request.~~

~~(ii) Examine a sample of rim cards for propriety of signatures and proper completion.~~

~~(iii) Foot (add up) balance increases/decreases of rim credit to ensure clerical accuracy of the outstanding rim credit balance.~~

~~(iv) For rim cards in which the outstanding rim credit balance has been reduced to zero by a transaction other than a transfer to another table or shift, verify that the rim credit was reduced by the issuance of a marker or paid in full by the customer within seven days from the last date of recorded customer rim activity by reviewing the customer's rim card(s) for the last date of the prior increase/decrease to the rim credit balance and comparing it to the final date of the rim credit balance was reduced to zero.~~

~~Comment (January): Please provide clarification of this standard. Does this provide for rim credit to be open for seven days or must rim credit be converted into a marker that must be paid within seven (7) days?~~

~~Response: Rim credit cards must be paid in full or replaced with a marker within seven days from the last date of recorded customer rim activity.  
Modified wording to clarify.~~

*Proposed revision as a result of January comment:*

~~(iv) For rim cards in which the outstanding rim credit balance has been reduced to zero by a transaction other than a transfer to another table or shift, verify that the rim credit was reduced by the issuance of a marker or paid in full by the customer within seven days from the last date of recorded customer rim activity, as required by 542.12 (n) (4), by reviewing the customer's rim card(s) for the last date of the prior increase/decrease to the rim credit balance and comparing it to the final date of the rim credit balance was reduced to zero.~~

~~(v) Determine if any issued markers used to reduce the rim credit balance were subsequently voided and rim credit improperly reopened.~~

~~(vi) For transfer of rim credit balances to another table or shift, verify that the amount transferred traces from one table's/shift's rim card to the other table's/shift's rim card.~~

~~(9) The following procedures shall be performed by accounting/auditing personnel using the master game summary prepared by the count team members for each day:~~

~~(i) Reconcile the dollar amount of currency drop proceeds on the master games summary to the dollar amount recorded in the applicable accountability document using, if applicable, the transfer forms indicating all transfers in/out of the currency count room, both during and at the end of the count. Investigate and document any variance noted.~~

~~(ii) Recalculate win/loss in total and by shift. For computerized master game summaries that compute win/loss, accounting personnel shall recalculate win/loss in total and by shift for at least one day each month, rather than daily.~~

~~Comment (January): Recommend striking "rather than daily" from the end of the standard.~~

~~Response: Qualifying language will be moved and restated for clarity. Modified accordingly.~~

~~Proposed revision as a result of January comment:~~

~~(ii) Recalculate win/loss in total and by shift on a daily basis. For computerized master game summaries that compute win/loss, accounting personnel shall recalculate win/loss in total and by shift for at least one day each month.~~

~~Comment (January): Recommend separating (ii) into (ii) and (iii) and renumbering balance.~~

~~Response: Agreed. Modified accordingly.~~

**Proposed revision as a result of January comment:**

**(ii) Recalculate win/loss in total and by shift on a daily basis.**

**(iii) For computerized master game summaries that compute win/loss, accounting personnel shall recalculate win/loss in total and by shift for at least one day each month.**

**(iv) Verify that the correct total of win/loss on the master games summary is recorded in the accounting records.**

**(v) Examine documents for propriety of signatures.**

**(2) (10) If a table game has the capability to determine drop (e.g., bill in/coin drop meters, bill acceptor, computerized record, etc.) the dollar amount of the drop shall be reconciled to the actual drop by shift. Follow up shall be performed for each table having an unresolved variance in excess of \$200 between actual cash and the automated recordings. The follow up performed by accounting/auditing personnel and results of investigation shall be documented and maintained for Tribal gaming regulatory authority review upon request.**

**Comment (January): Recommend substituting “investigation” for “follow-up”.**

**Response: Agreed. Modified accordingly.**

***Proposed revision as a result of January comment:***

**(2) (10) If a table game has the capability to determine drop (e.g., bill in/coin drop meters, bill acceptor, computerized record, etc.) the dollar amount of the drop shall be reconciled to the actual drop by shift. An investigation shall be performed for each table having an unresolved variance in excess of \$200 between actual cash and**

~~the automated recordings. The investigation performed by accounting/auditing personnel and results of investigation shall be documented and maintained for Tribal gaming regulatory authority review upon request.~~

~~(3) (11) Accounting/auditing employees shall review exception reports for all computerized table games systems at least monthly for propriety of transactions and unusual occurrences. The review shall include, but not be limited to, void authorizations.~~

~~(4) (12) All noted improper transactions or unusual occurrences shall be investigated with the results documented and maintained for Tribal gaming regulatory authority review upon request.~~

~~(13) For all contests, tournaments, promotional payouts (including payouts from computerized player tracking activity), drawings, and giveaway programs, the following documentation is required to be maintained:~~

~~Comment (January): There is not time period specified for retention.~~

~~Response: Agree. Will modify to indicate that the gaming operation, subject to the approval of the Tribal gaming regulatory authority, shall establish a reasonable time period during which the documentation shall be maintained.~~

~~*Proposed revision as a result of January comment:*~~

~~(13) For all contests, tournaments, promotional payouts (including payouts from computerized player tracking activity), drawings, and giveaway programs, the following documentation is required to be maintained for a reasonable time period as established by the gaming operation and approved by the Tribal gaming regulatory authority:~~

~~(i) Copies of the information provided to the customers describing the contests, tournaments, promotional payouts, drawings, and giveaway programs (e.g., brochures, fliers);~~

~~(ii) Effective dates and;~~

~~(iii) Accounting treatment, including general ledger accounts, if applicable.~~

~~(iv) For tournaments and contests, the name of the organizations (or persons) that conducted the contest/tournament on behalf of, or in conjunction with, the gaming operation, if any. The extent of responsibilities each organization and the gaming operation had in the contest/tournament (e.g., nonprofit receives 100% of the entry fees and provides noncash prizes to the winners with the gaming operation being responsible for collecting the entry fees, dealing the tournament and distributing prizes to winners) shall also be documented.~~

~~Comment (January): Is this referring to written agreements with third parties?~~

~~Response: Yes. The purpose of this requirement is to determine the appropriate accounting treatment.~~

~~Comment (January): Please provide clarification on what impact this standard will have on non-house banked table games and if it does apply what are the requirements for complying with this standard.~~

~~Response: NIGC's Office of General Counsel (OGC) has opined that Blackjack, regardless of how it is played, is a Class III game. Furthermore, non-house banked Blackjack is not a contest, which generally start and end within a relatively short period of time. Therefore, this standard has no applicability to non-house banked Blackjack.~~

~~(14) At least monthly, accounting/auditing personnel shall review all contests, tournaments, promotional payouts, drawings, and giveaway programs to confirm~~

~~proper accounting treatment and proper table games gross revenue win/loss computation.~~

~~Comment (January): Recommend adding the words “table games” after “all”. A similar change was made in the proposed gaming machine section.~~

~~Response: Agree. Revised accordingly.~~

*Proposed revision as a result of January comment:*

~~(14) At least monthly, accounting/auditing personnel shall review all table games contests, tournaments, promotional payouts, drawings, and giveaway programs to confirm proper accounting treatment and proper table games gross revenue win/loss computation.~~

~~Comment (January): Recommend allowing for a sample in this standard.~~

~~Response: The purpose of the standard is to verify that they were recorded correctly in the general ledger. Would anticipate that there would be only a handful of them.~~

~~Comment (January): In Oklahoma that is not the case. There are a lot of contests, tournaments, etc.~~

~~Response: It is not unreasonable to assume that the same type of contest, tournament, etc. would be accounted for in the same manner. Therefore, suggest the following: “At least monthly, accounting/auditing personnel shall perform procedures to reasonably ensure that table games contests, tournaments, promotional payouts, drawings, and giveaway programs are afforded proper accounting treatment.” Modified accordingly.~~

*Proposed revision as a result of January comments:*

~~(14) At least monthly, accounting/auditing personnel shall perform procedures to reasonably ensure that table games contests, tournaments, promotional payouts, drawings, and giveaway programs are afforded proper accounting treatment.~~

~~(15) At least monthly, accounting/auditing personnel shall perform procedures to ensure that promotional payouts, drawings, and giveaway programs are conducted~~

~~in accordance with the conditions provided the public. The procedures shall include a review of documents as well as employee interviews and/or observations.~~

~~Comment (January): A lengthy discussion regarding the assertions that employee interviews and/or observations were not an appropriate nor desirable activity for accounting/auditing personnel and that those types of activities were more in the nature of an investigation, which is more appropriately a regulatory activity.~~

~~Response: As a result of the concerns raised, the proposed requirement will be deleted and subsequent items renumbered accordingly. Modified accordingly.~~

~~(15) At least monthly, accounting/auditing personnel shall perform procedures to ensure that promotional payouts, drawings, and giveaway programs are conducted in accordance with the conditions provided the public. The procedures shall include a review of documents as well as employee interviews and/or observations.~~

~~(15) Daily, accounting/audit personnel shall reconcile all contest/tournament entry and payout forms to the dollar amounts recorded in the appropriate accountability document.~~

~~(16) When payment is made to the winners of a contest/tournament, accounting/audit personnel shall reconcile the contest/tournament entry fees collected to the actual contest/tournament payouts made. This reconciliation is to determine whether, based on the entry fees collected, the payouts made and amounts withheld by the gaming operation, if applicable, were distributed in accordance with the contest/tournament rules.~~

~~(5) (17) Evidence of table games auditing procedures and any follow up performed shall be documented, maintained for inspection, and provided to the Tribal gaming regulatory authority upon request.~~

~~(6) (18) A daily recap shall be prepared for the day and month to date, which shall include the following information:~~

~~(i) Drop;~~

~~(ii) Win; and~~

~~(iii) Gross revenue.~~

~~(19) Monthly, accounting/auditing personnel shall reconcile gross revenue from the general ledger to the month-end daily tables games recap.~~

~~Justification: Revisions expand the scope of the accounting and auditing standards to address the testing of player tracking systems, fill/credit issues and marker issuances/payments/voids and transfers, rim credit transactions, game results, drop variances, and contest/tournaments/promotional drawings and giveaway programs. It is noteworthy that the section has not been materially revised since 2002.~~

~~Comment (January): Recommend separating/rearranging those items that pertain to table games contests/tournaments, etc. from those that pertain to table games themselves.~~

~~Response: Agreed. Modified accordingly.~~

~~*Proposed revision as a result of January comment:*~~

~~(1) The accounting and auditing procedures shall be performed by personnel who are independent of the transactions being audited/accounted for.~~

~~(5) (2) Evidence of table games auditing procedures and any follow-up performed shall be documented, maintained for inspection, and provided to the Tribal gaming regulatory authority upon request.~~

~~(6) (3) A daily recap shall be prepared for the day and month to date, which shall include the following information:~~

~~(i) Drop;~~

~~(ii) Win; and~~

~~(iii) Gross revenue.~~

~~(4) Monthly, accounting/auditing personnel shall reconcile gross revenue from the general ledger to the month-end daily tables games recap.~~

~~(5) The following procedures shall be performed by accounting/auditing personnel using the master game summary prepared by the count team members for each day:~~

~~(i) Reconcile the dollar amount of currency drop proceeds on the master games summary to the dollar amount recorded in the applicable accountability document using, if applicable, the transfer forms indicating all transfers in/out of the currency count room, both during and at the end of the count. Investigate and document any variance noted.~~

~~(ii) Recalculate win/loss in total and by shift on a daily basis.~~

~~(iii) For computerized master game summaries that compute win/loss, accounting personnel shall recalculate win/loss in total and by shift for at least one day each month.~~

~~(iv) Verify that the correct total of win/loss on the master games summary is recorded in the accounting records.~~

~~(v) Examine documents for propriety of signatures.~~

~~(2) (6) If a table game has the capability to determine drop (e.g., bill in/coin drop meters, bill acceptor, computerized record, etc.) the dollar amount of the drop shall be reconciled to the actual drop by shift. An investigation shall be performed for each table having an unresolved variance in excess of \$200 between actual cash and the automated recordings. The investigation performed by accounting/auditing~~

~~personnel and results of investigation shall be documented and maintained for Tribal gaming regulatory authority review upon request.~~

~~(3) (7) Accounting/auditing employees shall review exception reports for all computerized table games systems at least monthly for propriety of transactions and unusual occurrences. The review shall include, but not be limited to, void authorizations.~~

~~(4) (8) All noted improper transactions or unusual occurrences shall be investigated with the results documented and maintained for Tribal gaming regulatory authority review upon request.~~

~~(9) For computerized player tracking systems, an accounting/audit employee shall perform the following procedures for at least one day per quarter:~~

~~(i) Review all point addition/deletion authorization documentation, other than for point addition/deletions made through an automated process, for propriety;~~

~~(ii) Review exception reports including point transfers between accounts; and~~

~~(iii) Review documentation related to access to inactive and closed accounts.~~

~~(10) At least annually, the computerized table game player tracking system shall be reviewed by personnel independent of the individuals that set up or make changes to the system parameters. The review is performed to determine that the configuration parameters are accurate and have not been altered without appropriate management authorization (e.g., verify the accuracy of the awarding of points based on the dollar amount wagered). The system should also be tested, if possible, to further verify the accuracy of the configuration parameters (e.g., simulate activity to verify the accuracy of the amount of points awarded). The test results shall be~~

documented and maintained for Tribal gaming regulatory authority review upon request.

(11) The following procedures shall be performed on fill/credit slips and marker credit slips by accounting/audit personnel:

(i) For manual fill/credit slips and manual marker credit slips, for at least one day per month, reconcile the original slip (placed in the table game drop box) to the restricted copy to verify that the dollar amount of the transaction is the same on both parts of the slip.

(ii) For manual fill/credit slips and manual marker credit slips, for at least one day per month, verify that all numerically numbered slips issued are properly accounted for. Investigations shall be performed for all slips that are unaccounted for with the investigation being documented and retained for Tribal gaming regulatory authority review upon request.

(iii) For at least one day per month, foot (add up) the original slips (placed in the table game drop box) and trace the total to the total fill/credit and marker credit amounts indicated on the master game summary prepared by the count team members. If the reconciliation results in a variance, an investigation shall be performed to determine whether all forms are accounted for with the investigation being documented and retained for Tribal gaming regulatory authority review upon request.

(iv) For each day, examine a sample of slips for propriety of signatures and proper completion.

(12) The following procedures shall be performed on marker issue/payment slips by accounting/audit personnel:

(i) For manual marker issue slips, for at least one day each month, verify that all numerically numbered slips are properly accounted for. Investigations shall be performed for all slips that are unaccounted for with the investigation being documented and retained for Tribal gaming regulatory authority review upon request.

(ii) For at least one day per month, foot (add up) the marker issue and payment slips (placed in the table game drop box) and trace the total to the total marker issue and payment amounts indicated on the master games summary prepared by the count team members. If the reconciliation results in a variance, an investigation shall be performed to determine whether all forms are accounted for with the investigation being documented and retained for Tribal gaming regulatory authority review upon request.

(iii) For each day, examine a sample of marker issue and payment slips for propriety of signatures and proper completion.

(iv) If count team members only totaled marker issue and payment slips by shift and traced to the totals documented by the computer system, for each day, verify that the issue/payment slips for each table are accurate.

(13) For each day, accounting/audit personnel shall reconcile the total dollar amount of markers transferred as indicated on the mass marker transfer form(s) and marker credit slips to the dollar amount recorded on the cage accountability

documentation. The mass marker transfer form shall be reviewed for propriety of signatures and proper completion.

(14) The following procedures shall be performed on voided markers and voided fill/credit slips by accounting/audit personnel (accounting/audit department employees who are soft count team members may perform) after the soft count process for each day:

(i) Examine all voided forms for proper authorization and “void” designation;

(ii) For fill/credit and marker computer systems, trace the voided form to computer system report(s) reflecting void activity;

(iii) For fill/credit and marker computer systems, examine the computer system report(s) reflecting void activity for void transactions that are not supported by a voided form.

(iv) Determine that all parts of the voided form have been received.

(v) Examine form for the proper number of signatures.

(vi) For all voided markers, determine that the void of the pit marker was not performed by cage personnel and compare the time of marker issuance to the time of voiding to determine that transactions were voided within 30 minutes after the issuance of the marker. If not voided within 30 minutes, determine whether the documented reason for exceeding the time period is adequate.

(15) The following procedures shall be performed on rim credit cards by accounting/audit personnel each day:

(i) Verify that all numerically numbered rim cards are properly accounted for.

Investigations shall be performed for all forms that are unaccounted for with the

investigation being documented and retained for Tribal gaming regulatory authority review upon request.

(ii) Examine a sample of rim cards for propriety of signatures and proper completion.

(iii) Foot (add up) balance increases/decreases of rim credit to ensure clerical accuracy of the outstanding rim credit balance.

(iv) For rim cards in which the outstanding rim credit balance has been reduced to zero by a transaction other than a transfer to another table or shift, verify that the rim credit was reduced by the issuance of a marker or paid in full by the customer within seven days from the last date of recorded customer rim activity, as required by 542.12 (n) (4), by reviewing the customer's rim card(s) for the last date of the prior increase/decrease to the rim credit balance and comparing it to the final date of the rim credit balance was reduced to zero.

(v) Determine if any issued markers used to reduce the rim credit balance were subsequently voided and rim credit improperly reopened.

(vi) For transfer of rim credit balances to another table or shift, verify that the amount transferred traces from one table's/shift's rim card to the other table's/shift's rim card.

(16) For all contests, tournaments, drawings, and giveaway programs, the following documentation is required to be maintained:

(i) Copies of the information provided to the customers describing the contests, tournaments, drawings, and giveaway programs (e.g., brochures, fliers);

(ii) Effective dates and;

~~(iii) Accounting treatment, including general ledger accounts, if applicable.~~

~~(iv) For tournaments and contests, the name of the organizations (or persons) that conducted the contest/tournament on behalf of, or in conjunction with, the gaming operation, if any. The extent of responsibilities each organization and the gaming operation had in the contest/tournament (e.g., nonprofit receives 100% of the entry fees and provides noncash prizes to the winners with the gaming operation being responsible for collecting the entry fees, dealing the tournament and distributing prizes to winners) shall also be documented.~~

~~(17) At least monthly, accounting/auditing personnel shall review all contests, tournaments, drawings, and giveaway programs to confirm proper accounting treatment and proper table games gross revenue win/loss computation.~~

~~(18) Daily, accounting/audit personnel shall reconcile all contest/tournament entry and payout forms to the dollar amounts recorded in the appropriate accountability document.~~

~~(19) When payment is made to the winners of a contest/tournament, accounting/audit personnel shall reconcile the contest/tournament entry fees collected to the actual contest/tournament payouts made. This reconciliation is to determine whether, based on the entry fees collected, the payouts made and amounts withheld by the gaming operation, if applicable, were distributed in accordance with the contest/tournament rules.~~

~~(1) The accounting and auditing procedures shall be performed by personnel who are independent of the transactions being audited/accounted for.~~

~~(2) Evidence of table games auditing procedures and any follow up performed shall be documented, maintained for inspection, and provided to the Tribal gaming regulatory authority upon request.~~

~~(3) A daily recap shall be prepared for the day and month to date, which shall include the following information:~~

~~(i) Drop;~~

~~(ii) Win; and~~

~~(iii) Gross revenue.~~

~~(4) Monthly, accounting/auditing personnel shall reconcile gross revenue from the general ledger to the month-end daily tables games recap.~~

~~(5) The following procedures shall be performed by accounting/auditing personnel using the master game summary prepared by the count team members for each day:~~

~~(i) Reconcile the dollar amount of currency drop proceeds on the master games summary to the dollar amount recorded in the applicable accountability document using, if applicable, the transfer forms indicating all transfers in/out of the currency count room, both during and at the end of the count. Investigate and document any variance noted.~~

~~(ii) Recalculate win/loss in total and by shift on a daily basis.~~

~~(iii) For computerized master game summaries that compute win/loss, accounting personnel shall recalculate win/loss in total and by shift for at least one day each month.~~

~~(iv) Verify that the correct total of win/loss on the master games summary is recorded in the accounting records.~~

~~(v) Examine documents for propriety of signatures.~~

~~(6) If a table game has the capability to determine drop (e.g., bill in/coin drop meters, bill acceptor, computerized record, etc.) the dollar amount of the drop shall be reconciled to the actual drop by shift. An investigation shall be performed for each table having an unresolved variance in excess of \$200 between actual cash and the automated recordings. The investigation performed by accounting/auditing personnel and results of investigation shall be documented and maintained for Tribal gaming regulatory authority review upon request.~~

~~(7) Accounting/auditing employees shall review exception reports for all computerized table games systems at least monthly for propriety of transactions and unusual occurrences. The review shall include, but not be limited to, void authorizations.~~

~~(8) All noted improper transactions or unusual occurrences shall be investigated with the results documented and maintained for Tribal gaming regulatory authority review upon request.~~

~~(9) For computerized player tracking systems, an accounting/audit employee shall perform the following procedures for at least one day per quarter:~~

~~(i) Review all point addition/deletion authorization documentation, other than for point addition/deletions made through an automated process, for propriety;~~

~~(ii) Review exception reports including point transfers between accounts; and~~

~~(iii) Review documentation related to access to inactive and closed accounts.~~

(10) At least annually, the computerized table game player tracking system shall be reviewed by personnel independent of the individuals that set up or make changes to the system parameters. The review is performed to determine that the configuration parameters are accurate and have not been altered without appropriate management authorization (e.g., verify the accuracy of the awarding of points based on the dollar amount wagered). The system should also be tested, if possible, to further verify the accuracy of the configuration parameters (e.g., simulate activity to verify the accuracy of the amount of points awarded). The test results shall be documented and maintained for Tribal gaming regulatory authority review upon request.

(11) The following procedures shall be performed on fill/credit slips and marker credit slips by accounting/audit personnel:

(i) For manual fill/credit slips and manual marker credit slips, for at least one day per month, reconcile the original slip (placed in the table game drop box) to the restricted copy to verify that the dollar amount of the transaction is the same on both parts of the slip.

(ii) For manual fill/credit slips and manual marker credit slips, for at least one day per month, verify that all numerically numbered slips issued are properly accounted for. Investigations shall be performed for all slips that are unaccounted for with the investigation being documented and retained for Tribal gaming regulatory authority review upon request.

(iii) For at least one day per month, foot (add up) the original slips (placed in the table game drop box) and trace the total to the total fill/credit and marker credit

amounts indicated on the master game summary prepared by the count team members. If the reconciliation results in a variance, an investigation shall be performed to determine whether all forms are accounted for with the investigation being documented and retained for Tribal gaming regulatory authority review upon request.

(iv) For each day, examine a sample of slips for propriety of signatures and proper completion.

(12) The following procedures shall be performed on marker issue/payment slips by accounting/audit personnel:

(i) For manual marker issue slips, for at least one day each month, verify that all numerically numbered slips are properly accounted for. Investigations shall be performed for all slips that are unaccounted for with the investigation being documented and retained for Tribal gaming regulatory authority review upon request.

(ii) For at least one day per month, foot (add up) the marker issue and payment slips (placed in the table game drop box) and trace the total to the total marker issue and payment amounts indicated on the master games summary prepared by the count team members. If the reconciliation results in a variance, an investigation shall be performed to determine whether all forms are accounted for with the investigation being documented and retained for Tribal gaming regulatory authority review upon request.

(iii) For each day, examine a sample of marker issue and payment slips for propriety of signatures and proper completion.

~~(iv) If count team members only totaled marker issue and payment slips by shift and traced to the totals documented by the computer system, for each day, verify that the issue/payment slips for each table are accurate.~~

~~(13) For each day, accounting/audit personnel shall reconcile the total dollar amount of markers transferred as indicated on the mass marker transfer form(s) and marker credit slips to the dollar amount recorded on the cage accountability documentation. The mass marker transfer form shall be reviewed for propriety of signatures and proper completion.~~

~~(14) The following procedures shall be performed on voided markers and voided fill/credit slips by accounting/audit personnel (accounting/audit department employees who are soft count team members may perform) after the soft count process for each day:~~

~~(i) Examine all voided forms for proper authorization and "void" designation;~~

~~(ii) For fill/credit and marker computer systems, trace the voided form to computer system report(s) reflecting void activity;~~

~~(iii) For fill/credit and marker computer systems, examine the computer system report(s) reflecting void activity for void transactions that are not supported by a voided form.~~

~~(iv) Determine that all parts of the voided form have been received.~~

~~(v) Examine form for the proper number of signatures.~~

~~(vi) For all voided markers, determine that the void of the pit marker was not performed by cage personnel and compare the time of marker issuance to the time of voiding to determine that transactions were voided within 30 minutes after the~~

issuance of the marker. If not voided within 30 minutes, determine whether the documented reason for exceeding the time period is adequate.

(15) The following procedures shall be performed on rim credit cards by accounting/audit personnel each day:

(i) Verify that all numerically numbered rim cards are properly accounted for. Investigations shall be performed for all forms that are unaccounted for with the investigation being documented and retained for Tribal gaming regulatory authority review upon request.

(ii) Examine a sample of rim cards for propriety of signatures and proper completion.

(iii) Foot (add up) balance increases/decreases of rim credit to ensure clerical accuracy of the outstanding rim credit balance.

(iv) For rim cards in which the outstanding rim credit balance has been reduced to zero by a transaction other than a transfer to another table or shift, verify that the rim credit was reduced by the issuance of a marker or paid in full by the customer within seven days from the last date of recorded customer rim activity, as required by 542.12 (n) (4), by reviewing the customer's rim card(s) for the last date of the prior increase/decrease to the rim credit balance and comparing it to the final date of the rim credit balance was reduced to zero.

(v) Determine if any issued markers used to reduce the rim credit balance were subsequently voided and rim credit improperly reopened.

(vi) For transfer of rim credit balances to another table or shift, verify that the amount transferred traces from one table's/shift's rim card to the other table's/shift's rim card.

(16) For all contests, tournaments, drawings, and giveaway programs, the following documentation is required to be maintained:

(i) Copies of the information provided to the customers describing the contests, tournaments, drawings, and giveaway programs (e.g., brochures, fliers);

(ii) Effective dates and;

(iii) Accounting treatment, including general ledger accounts, if applicable.

(iv) For tournaments and contests, the name of the organizations (or persons) that conducted the contest/tournament on behalf of, or in conjunction with, the gaming operation, if any. The extent of responsibilities each organization and the gaming operation had in the contest/tournament (e.g., nonprofit receives 100% of the entry fees and provides noncash prizes to the winners with the gaming operation being responsible for collecting the entry fees, dealing the tournament and distributing prizes to winners) shall also be documented.

(17) At least monthly, accounting/auditing personnel shall review all contests, tournaments, drawings, and giveaway programs to confirm proper accounting treatment and proper table games gross revenue win/loss computation.

(18) Daily, accounting/audit personnel shall reconcile all contest/tournament entry and payout forms to the dollar amounts recorded in the appropriate accountability document.

~~(19) When payment is made to the winners of a contest/tournament, accounting/audit personnel shall reconcile the contest/tournament entry fees collected to the actual contest/tournament payouts made. This reconciliation is to determine whether, based on the entry fees collected, the payouts made and amounts withheld by the gaming operation, if applicable, were distributed in accordance with the contest/tournament rules.~~

~~(k)~~ (i) *Marker credit play.* (1) If a gaming operation allows marker credit play (exclusive of rim credit and call bets), the following standards shall apply:

~~(i) A marker system shall allow for credit to be both issued and repaid in the pit.~~

**Justification:** Revision is intended to allow greater latitude to management whether to allow the repayment of a marker at the pit or require repayments to occur at the cage.

~~(ii)~~ (i) Prior to the issuance of gaming credit to a player, the employee extending the credit shall ~~contact the cashier or other independent source to~~ determine if the player's credit limit has been properly established and there is sufficient remaining credit available for the advance.

(ii) Unless otherwise known to the employee extending the credit and the personal identification information of the player is on file with the gaming operation, verify the customer's identity by examining the customer's identification credential or other reasonable method to ensure the customer's identity. A customer's driver's license is the preferred method for verifying the customer's identity. A passport, non-resident alien identification card, other government issued identification credential or other picture identification credential normally acceptable as a means of identification when cashing checks, may also be used. Subject to approval of the Tribal gaming regulatory authority, tribal identifications may be acceptable.

**Comment** (January): Recommend adding the word “membership” after tribal to distinguish a tribal membership ID from any other kind of tribal ID (e.g. employee ID)

**Response:** Agreed. Modified accordingly. All references to “tribal identification” will be modified as well.

*Proposed revision as a result of January comment:*

**(ii) Unless otherwise known to the employee extending the credit and the personal identification information of the player is on file with the gaming operation, verify the customer’s identity by examining the customer’s identification credential or other reasonable method to ensure the customer’s identity. A customer’s driver’s license is the preferred method for verifying the customer’s identity. A passport, non-resident alien identification card, other government issued identification credential or other picture identification credential normally acceptable as a means of identification when cashing checks, may also be used. Subject to approval of the Tribal gaming regulatory authority, tribal membership identifications may be acceptable.**

**(A) To mitigate the risk of identity theft, it is recommended that, within the customer records of the gaming operation, a scanned copy of a picture identification and signature be obtained and stored.**

**(B) [Reserved]**

**Justification:** Revision is intended to require the employee extending credit to confirm the identity of the customer credit is being extended, unless that customer is already known to the employee and the necessary information is already on file with the gaming operation. Furthermore, requirements are being established for acceptable identification documents.

**Comment** (January): This language currently reads as a recommendation and should be revised to read as a standard.

**Response:** Rather than requiring gaming operations to maintain a picture of the customer, agree to strike the proposed standard. Modified accordingly.

*Proposed revision as a result of January comment:*

~~**(A) To mitigate the risk of identity theft, it is recommended that, within the customer records of the gaming operation, a scanned copy of a picture identification and signature be obtained and stored.**~~

~~**(B) [Reserved]**~~

(iii) Proper authorization of credit extension in excess of the previously established limit shall be documented.

(iv) The amount of credit extended shall be communicated to the cage or another independent source and the amount documented within a reasonable time subsequent to each issuance.

(v) The marker form shall be prepared in at least triplicate form (triplicate form being defined as three parts performing the functions delineated in the standard in paragraph (k)

(1) (vi) of this section), with a preprinted or concurrently-printed marker number, and utilized in numerical sequence. (This requirement shall not preclude the distribution of batches of markers to various pits.) (Revised May 4, 2005)

(vi) At least three parts of each separately numbered marker form shall be utilized as follows:

(A) Original, **the negotiable instrument**, shall be maintained in the pit until **settled paid** or transferred to the cage;

(B) Payment slip shall be maintained in the pit until the marker is **settled paid** or transferred to the cage. If paid in the pit, the slip shall be inserted in the table game drop box. If not paid in the pit, the slip shall be transferred to the cage with the original.

**Payment slips are not required if all markers are immediately transferred to the cage upon issuance, resulting in payments in the pit being precluded;**

(C) Issue slip shall be inserted into the appropriate table game drop box when credit is extended or when the player has signed the original.

**Justification:** Revisions are intended to add clarity regarding the marker documentation requirements, particularly payment slips.

(vii) When marker documentation (e.g., issue slip and payment slip) is inserted in the drop box, such action shall be performed by the dealer or boxperson at the table.

(viii) A record of each customer's credit activity shall be maintained that details the following ~~(e.g., master credit record retained at the pit podium)~~:

(A) The ~~signature or initials~~ **name or other identifier** of the person(s) approving the extension of credit ~~(unless such information is contained elsewhere for each issuance)~~;

(B) The legible name of the person receiving the credit;

(C) The date and ~~shift~~ **time** of granting the credit;

(D) The table ~~on which~~ **number** ~~where~~ the credit was extended;

(E) The amount of credit issued;

(F) The marker number;

(G) The amount of credit remaining after each issuance or the total credit available for all issuances;

(H) The amount of payment received and nature of ~~settlement~~ **payment** (e.g., ~~credit slip number~~, cash, chips, etc.) **or, if transferred to the cage, the marker credit slip or mass marker transfer form number**; and

(I) The ~~signature or initials~~ name or other identifier of the person receiving payment/~~settlement~~.

**Justification:** Revisions are intended to provide better clarity and consistency in the regulation governing the collection of information specific to the issuance of markers.

(ix) The forms required in paragraphs (k) (1) ~~(v), (vi), and~~ (viii) of this section shall be safeguarded, and adequate procedures shall be employed to control the distribution, use, and access to these forms. All portions of the markers, both issued and unissued, shall be safeguarded and procedures shall be employed to control the distribution, use and access to the forms.

**Justification:** Revision is intended to extend the required controls over the record of marker transactions to the individual marker forms.

**Comment** (January): The proposed addition to (ix) is already contained in (xxiv). Recommend striking.

**Response:** Agree. Modified accordingly.

*Proposed revision as a result of January comment:*

(ix) The forms required in paragraphs (k) (1) ~~(v), (vi), and~~ (viii) of this section shall be safeguarded, and adequate procedures shall be employed to control the distribution, use, and access to these forms. (Revised May 4, 2005)

(x) All credit extensions shall be initially evidenced by lammer buttons, which shall be displayed on the table in public view and placed there by supervisory personnel.

(xi) Marker preparation shall be initiated and other records updated within approximately one hand of play following the initial issuance of credit to the player. Marker preparation shall be completed (i.e., dealer signs and drops the issue slip) no later than thirty minutes after the chips are given to the customer unless the reason for exceeding the time period is documented.

**Justification:** Revision is intended to establish minimum requirements that the marker be created within a specified time after the chips have been provided to the customer, or justification for the delay documented.

(xii) ~~Lammer buttons shall be removed only by the dealer or boxperson employed at the table upon completion of a marker transaction.~~ Only the dealer or boxperson may move the lammer buttons from the table into the table tray/inventory, or move the lammer buttons to a neutral area for subsequent removal by pit supervisory personnel. This procedure shall be performed when the marker slip is placed in the table game drop box.

**Justification:** Revision is intended to add clarity to the standing and to identify acceptable alternative procedures for management.

(xiii) The original marker shall contain at least the following information:

(A) Marker number;

(B) Player's name and signature;

(C) Date; and

(D) Amount of credit issued.

(xiv) The issue slip or stub shall include the same marker number as the original, the table number, date and time of issuance, and amount of credit issued. The issue slip or stub shall also include the signature of the person extending the credit, and the signature or initials of the dealer or boxperson at the applicable table, unless this information is included on another document verifying the issued marker.

(xv) The payment slip shall include the same marker number as the original. When the marker is paid in full in the pit, it shall also include the table number where paid, date and time of payment, nature of settlement (cash, chips, etc.), and amount of payment. The payment slip shall also include the signature of pit supervisory personnel acknowledging

payment, and the signature or initials of the dealer or boxperson receiving payment, unless this information is included on another document verifying the payment of the marker.

**(xvi) Voided markers shall contain the following:**

**(A) “Void” written across the original marker, issue slip (if available at the time of the void) and payment slip.**

**(B) The reason a marker is voided shall be documented on one part, or other document (e.g. log) sufficiently identifying the marker.**

**(C) Date and time of void on at least one part of the marker.**

**(D) Signatures on at least one part of the marker (adjacent to the void indication) of two pit personnel performing the void, at least one of whom is a pit supervisor. A pit clerk may be a nonsupervisory signer. In the event a pit marker is voided later by accounting/audit personnel, the signature of two pit personnel authorizing the void is required.**

**(xvii) The voiding process must be completed as follows:**

**(A) No later than thirty minutes after the issuance of the marker the void must be performed, unless the reason for exceeding the time period is documented on one part of the marker or other document (e.g. log) sufficient to identify the marker.**

**(B) All parts of the voided marker shall be transferred to the cage at the end of each shift for subsequent transfer to accounting. A voided marker shall not be placed in the table game drop box unless the issue slip had been previously dropped. Only when markers are voided after the issue slip has been placed in the table game drop box shall the dealer insert the voided original marker, or alternate documentation**

indicating the marker has been voided, into the same table game drop box as the issue slip.

**Justification:** Revisions are intended to establish the minimum controls necessary to safeguard the process of voiding of markers.

(xviii) If a marker payment is made at a table other than the table of issuance and the payment (i.e. chips or cash) is transferred to the table of issuance, the following standards shall apply:

(A) A transfer document shall accompany the payment to the table of issuance. The transfer document shall indicate the date and time, dollar amount of payment, marker number, table number where payment was accepted, and table number where marker was originally issued. The transfer document shall be signed by the dealer accepting the payment from the customer and by the dealer at the table of original issuance. The transfer document shall be dropped in the drop box of the table where the payment was transferred.

**Comment** (January): Recommend substituting “to which” for “where” in the last sentence.

**Response:** Agree. Modified accordingly.

*Proposed revision as a result of January comment:*

(A) A transfer document shall accompany the payment to the table of issuance. The transfer document shall indicate the date and time, dollar amount of payment, marker number, table number where payment was accepted, and table number where marker was originally issued. The transfer document shall be signed by the dealer accepting the payment from the customer and by the dealer at the table of

original issuance. The transfer document shall be dropped in the drop box of the table to which the payment was transferred.

(B) This standard (xviii) is applicable only when marker payments are transferred from one table to another open table. A marker payment cannot be made at or transferred to a closed table.

(C) The transfer document can be the marker payment slip that provides the required information.

(xix) If a marker payment is made by a customer at a table other than the table of marker issuance and the payment (i.e. chips or cash) is transferred to the cage, the following standards shall apply:

(A) A transfer document shall accompany the payment to the cage. The transfer document shall indicate the date and time, dollar amount of the payment, marker number, table number where payment was accepted, and cage window where payment was transferred. The transfer document shall be signed by the dealer accepting the payment and by the cage cashier receiving the marker payment. The transfer document shall be forwarded to the accounting department at the end of the day.

(B) This standard (xix) is applicable only when the table of marker issuance is closed, in which case the marker will be transferred concurrently to the cage in accordance with the standards contained herein, or the marker has previously been transferred to the cage.

(xx) Once a marker has been transferred from the pit to the cage, any subsequent payments shall be transacted and recorded at the cage.

**Justification:** Revision is intended to establish the minimum controls specific to the receipt of a marker payment other than the table of issuance. In part, the objective of the control is to preserve the integrity of the table net win calculation.

~~(xvi)~~ **(xxi)** When partial payments are made in the pit, a new marker shall be completed reflecting the remaining balance and the marker number of the marker originally issued.

~~(xvii)~~ **(xxii)** When partial payments are made in the pit, the payment slip of the marker that was originally issued shall be properly cross-referenced to the new marker number, completed with all information required by paragraph (k)(1)(xv) of this section, and inserted into the drop box. (Revised May 4, 2005)

~~(xviii)~~ **(xxiii)** The cashier's cage or another independent source shall be notified when payments (full or partial) are made in the pit so that cage records can be updated for such transactions. Notification shall be made no later than when the customer's play is completed or at shift end, whichever is earlier. **This notification may be in the form of the pit updating the customer's credit account in the computer system for the payment.**

**Justification:** Revision is intended to identify alternative procedures that may satisfy the control.

~~(xix)~~ **(xxiv)** All portions of markers, both issued and unissued, shall be safeguarded and procedures shall be employed to control the distribution, use and access to the forms.

~~(xx)~~ **(xxv)** An investigation shall be performed to determine the cause and responsibility for loss whenever marker forms, or any part thereof, are missing. These investigations shall be documented, maintained for inspection, and provided to the Tribal gaming regulatory authority upon request.

~~(xxi) (xxvi) When markers are transferred to the cage, marker transfer forms or marker credit slips (or similar documentation) shall be utilized and such documents shall include, at a minimum, the date, time, shift, marker number(s), table number(s), amount of each marker, the total amount transferred, signature of pit supervisory personnel releasing instruments from the pit, and the signature of cashier verifying receipt of instruments at the cage. When a mass marker transfer is completed at the end of the shift or day to transfer all outstanding markers to the cage, the mass marker transfer forms or marker credit slip (or similar documentation) shall be utilized. Such documents shall include, at a minimum, the document number, date, time, marker number(s), table number(s), amount of each marker, the total amount transferred, signature of pit supervisor releasing instruments from the pit, and the signature of cashier verifying receipt of instruments at the cage. The mass marker transfer form shall be transferred to the accounting department on a daily basis.~~

**Comment** (January): Mass marker transfers should take place at the end of a shift or no later than the end of the day. The current wording fails to communicate this and therefore needs revising.

**Response:** Agree. Revised accordingly.

*Proposed revision as a result of January comment:*

~~(xxi) (xxvi) When markers are transferred to the cage, marker transfer forms or marker credit slips (or similar documentation) shall be utilized and such documents shall include, at a minimum, the date, time, shift, marker number(s), table number(s), amount of each marker, the total amount transferred, signature of pit supervisory personnel releasing instruments from the pit, and the signature of~~

~~cashier verifying receipt of instruments at the cage.~~ Mass marker transfers, if utilized, shall be performed at the end of the shift or no later than the end of the day to transfer all outstanding markers to the cage. Mass marker transfer forms or marker credit slip (or similar documentation) shall be utilized. Such documents shall include, at a minimum, the document number, date, time, marker number(s), table number(s), amount of each marker, the total amount transferred, signature of pit supervisor releasing instruments from the pit, and the signature of cashier verifying receipt of instruments at the cage. The mass marker transfer form shall be transferred to the accounting department on a daily basis.

~~(xxii) All markers shall be transferred to the cage within twenty-four (24) hours of issuance.~~

~~(xxiii)~~ (xxvii) Markers shall be transported to the cashier's cage by a person who is independent of the marker issuance and payment functions (pit clerks may perform this function).

(2) [Reserved]

**Justification:** Revision is intended to recognize and establish the minimum controls relevant to a daily transfer of all markers from the pit to the cage.

~~(i)~~ (i) *Name credit instruments accepted in the pit.*

**Comment** (January): Will these standards also apply to front money?

**Response:** No.

(1) For the purposes of this paragraph, name credit instruments means personal checks, payroll checks, counter checks, hold checks, ~~traveler's checks~~, or other similar instruments that are accepted in the pit as a form of credit issuance to a player with an approved credit limit.

(2) The following standards shall apply if name credit instruments are accepted in the pit:

(i) A name credit system shall allow for the issuance of credit without using markers;

**(ii) Unless otherwise known to the employee extending the credit and the personal identification information of the player is on file with the gaming operation, verify the customer's identity by examining the customer's identification credential or other reasonable method to ensure the customer's identity. A customer's driver's license is the preferred method for verifying the customer's identity. A passport, non-resident alien identification card, other government issued identification credential or other picture identification credential normally acceptable as a means of identification when cashing checks, may also be used. Subject to approval of the Tribal gaming regulatory authority, tribal membership identifications may be acceptable.**

**Justification:** Proposed revision is intended to establish the requirement that the issuer of the named credit instrument must confirm the identity of the customer before executing the transaction.

~~(ii)~~ **(iii)** Prior to accepting a name credit instrument, the employee extending the credit shall contact the cashier or another independent source to determine if the player's credit limit has been properly established and the remaining credit available is sufficient for the advance;

~~(iii)~~ **(iv)** All name credit instruments shall be transferred to the cashier's cage (utilizing a two-part order for credit) immediately following the acceptance of the instrument and issuance of chips (if name credit instruments are transported accompanied by a credit slip, an order for credit is not required);

~~(iv) The order for credit (if applicable) and the credit slip shall include the customer's name, amount of the credit instrument, the date, time, shift, table number, signature of pit supervisory personnel releasing instrument from pit, and the signature of the cashier verifying receipt of instrument at the cage;~~

~~(v) The procedures for transacting table credits at standards in paragraphs (c)(12) through (19) of this section shall be strictly adhered to; and~~

~~(vi) The acceptance of payments in the pit for name credit instruments shall be prohibited.~~

**Justification:** Proposed revision is intended to delete standards that have become outdated or determined to be unnecessary.

**(v) Once a check has been transferred from the pit to the cage, any subsequent payments shall be transacted and recorded at the cage.**

**(vi) When traveler's checks and other guaranteed drafts are accepted at a table game, all required issuance and acceptance procedures must be adhered to by the drawee and pit personnel. The traveler's checks and guaranteed drafts shall be inserted in the table game drop box by the dealer after chips are issued to the customer.**

**Justification:** Proposed revision is intended to establish the minimum controls governing the acceptance of traveler's checks and other guaranteed drafts.

**Comment (January):** Traveler's checks are not name credit instruments and should be a standalone item.

**Response:** Agree. Renumbered as (3)

*Proposed revision as a result of January comment:*

**(3) When traveler's checks and other guaranteed drafts are accepted at a table game, all required issuance and acceptance procedures must be adhered to by the drawee and pit personnel. The traveler's checks and guaranteed drafts shall be inserted in the table game drop box by the dealer after chips are issued to the customer.**

**(m) (k)** *Call bets.* (1) The following standards shall apply if call bets are accepted in the pit:

(i) A call bet shall be evidenced by the placement of a lammer button, chips, or other identifiable designation in an amount equal to that of the wager in a specific location on the table;

(ii) The placement of the lammer button, chips, or other identifiable designation shall be performed by supervisory/boxperson personnel. The placement may be performed by a dealer only if the supervisor physically observes and gives specific authorization;

(iii) The call bet shall be settled at the end of each hand of play by the preparation of a marker, **entry on a rim credit card**, repayment of the credit extended, or the payoff of the winning wager. Call bets extending beyond one hand of play shall be prohibited; and

**(iv) Lammer buttons shall remain on the table until the call bet is paid with chips or cash, or results in the issuance of a marker. For call bets that result in an entry on a rim credit card, the lammer button shall remain on the table until the rim credit is paid, is transferred to another table or a marker is issued.**

**Justification:** Revision is intended to recognize that a call bet may result in a rim credit transaction.

(iv) The removal of the lammer button, chips, or other identifiable designation shall be performed by the dealer/ boxperson upon completion of the call bet transaction.

(2) [Reserved]

**Note:** Numbering corrected.

(1) *Rim credit.* (1) The following standards shall apply if rim credit is extended in the pit:

(i) Rim credit shall be evidenced by the issuance of chips to be placed in a neutral zone on the table and then extended to the customer for the customer to wager, or to the dealer to wager for the customer, and by the placement of a lammer button or other identifiable designation in an amount equal to that of the chips extended. **The lammer buttons shall remain on the table until the rim credit is paid or a marker is issued;** and

(ii) Rim credit shall be recorded on player cards, or similarly used documents, which shall be:

(A) Prenumbered or concurrently numbered and accounted for by a department independent of the pit;

**(B) Date and time of each balance increase/decrease;**

**(C) Dollar amount of each balance increase/decrease;**

**(D) An indication of one or more of the following types of balance increases: 1) Issuance of rim credit; 2) Transfer of rim credit balance from another table; or 3) Transfer of rim credit balance from the previous shift.**

**(E) An indication of one or more of the following types of balance decreases: 1) Payment in cash; 2) Payment in chips; 3) Issuance of marker; 4) Transfer of rim credit to another table; or 5) Transfer of rim credit balance to the next shift.**

~~(B)~~ **(F)** For all extensions and subsequent repayments, evidenced by the initials or signatures of a supervisor and the dealer attesting to the validity of each credit extension and repayment; **and**

(G) Outstanding rim credit balance.

~~(C) An indication of the settlement method (e.g., serial number of marker issued, chips, cash);~~

~~(D) Settled no later than when the customer leaves the table at which the card is prepared;~~

~~(E) Transferred to the accounting department on a daily basis; and~~

~~(F) Reconciled with other forms utilized to control the issuance of pit credit (e.g., master credit records, table cards).~~

(2) For each balance increase/decrease recorded on the customer's rim card, the supervisor and dealer shall compare the actual lammer buttons on the table to the outstanding rim credit amount on the customer's rim card. Any discrepancy between the actual lammer buttons evidencing outstanding rim credit on the table and the rim credit recorded on the rim card shall be investigated. The results shall be documented and retained for a period of time determined by the Tribal gaming regulatory authority.

(3) An outstanding rim credit balance shall be reduced to zero by the receipt of payment or issuance of a marker no later than when the customer leaves the table, unless one of the following occurs:

(A) Rim credit balance is transferred to another table;

(B) The table remains open and fully staffed while the customer is away from the table; or

(C) If the table closes, an individual independent of the table games department ensures: 1) The rim credit card and lammer buttons are secured at the table until

the rim credit balance is paid, marker issued or the customer returns to the table; 2)

The rim credit is reconciled to the lammer buttons evidencing the outstanding credit issuances upon closing and again when the table reopens; and 3) The total balance of outstanding rim credit documented on the rim cards is reconciled to the rim credit balance carried on the table inventory document at each shift end.

(4) An outstanding rim credit balance must be reduced to zero through the issuance of a marker or payment in full by the customer within seven days from the last date of recorded customer rim activity.

(5) Rim cards with a zero balance shall be transferred to the accounting department on a daily basis by an individual independent of the rim credit transactions.

**Justification:** Proposed revisions are intended to clarify and enhance the regulation governing rim credit and to establish the controls relevant to the transfer of an outstanding rim credit balance to another table.

~~(e)~~ **(m)** *Foreign currency.* (l) The following standards shall apply if foreign currency is accepted in the pit:

(i) Foreign currency transactions shall be authorized by a pit supervisor/ boxperson who completes a foreign currency exchange form before the exchange for chips or tokens;

(ii) Foreign currency exchange forms include the country of origin, total face value, amount of chips/token extended (i.e., conversion amount), signature of supervisor/ boxperson, and the dealer completing the transaction;

(iii) Foreign currency exchange forms and the foreign currency shall be inserted in the drop box by the dealer; and

(iv) Alternate procedures specific to the use of foreign valued gaming chips shall be developed by the Tribal gaming regulatory authority, or the gaming operation as approved by the Tribal gaming regulatory authority.

(2) [Reserved]

**(n) Promotional payouts, drawings and giveaway programs. (1) The conditions for participating in promotional payouts, including drawings and giveaway programs, shall be prominently displayed or available for customer review at the licensed location.**

**(i) Applies to promotional payouts, drawings, and giveaway programs in which the payouts are made from a bank other than the table inventory, the payouts are related to table games wagering activity, and the game play procedures are not affected.**

**(ii) Such payouts are not deductible when reporting assessable gaming revenue. Standards do not apply to payouts from the table inventory resulting from a wager made with a promotional coupon or chip.**

**(2) Promotional payouts, including those as a result of drawings and giveaway programs, that are greater than or equal to \$600 shall be documented at the time of the payout to include the following:**

**(i) Date and time;**

**(ii) Dollar amount of payout or description of personal property (e.g., car);**

**(iii) Reason for payout (e.g., promotion name);**

**(iv) Signature of one employee verifying, authorizing, and completing the promotional payout with the customer;**

**(v) Customer's name (for drawings only).**

**(vi) Documentation may be prepared by an individual who is not a table games department employee as long as the required signature is that of the employee completing the payout with the customer.**

**(3) If the promotional cash (or cash equivalent) payout, including those as a result of drawings and giveaway programs, is less than \$600, documentation is required to be created to support the bank accountability for which the payout was made.**

**Required documentation consists of a line item on a cage or table games accountability document.**

**Justification:** Revision is intended to identify the minimum controls governing table game promotional payouts, drawing and giveaway programs that are related to but not deductible from table games revenue. Separate payout procedures are specific to amounts equal to or greater than \$600 and payouts less than \$600.

**Comment** (January): Promotional payouts can/are interpreted to be items other than cash that are awarded to a player as a result of a winning wager. Recommend striking all references to promotional payouts from this standard (o).

**Response:** Agree. Modified accordingly.

**Comment** (January): (A) should read "Applies to drawings, and giveaway programs in which the payouts are made from a bank other than the table inventory, the payouts are not related to a table games wager, and the game play procedures are not affected."

**Response:** Agree. Modified accordingly.

**Comment** (January): Recommend adding "or as determined by the IRS reporting threshold" after "\$600".

**Response:** Agree. Modified accordingly.

**Comment** (January): Recommend requiring two employees rather than one to verify the payout.

**Response:** Agree. Modified accordingly.

*Proposed revision as a result of January comments:*

**(n) Drawings and giveaway programs. (1) The conditions for participating in drawings and giveaway programs, shall be prominently displayed or available for customer review at the licensed location.**

**(i) Applies to drawings, and giveaway programs in which the payouts are made from a bank other than the table inventory, the payouts are not related to table games wager, and the game play procedures are not affected.**

**(ii) Such payouts are not deductible when reporting assessable gaming revenue. Standards do not apply to payouts from the table inventory resulting from a wager made with a promotional coupon or chip.**

**(2) Payouts as a result of drawings and giveaway programs that are greater than or equal to \$600 or as determined by the IRS reporting threshold, shall be documented at the time of the payout to include the following:**

**(i) Date and time;**

**(ii) Dollar amount of payout or description of personal property (e.g., car);**

**(iii) Reason for payout (e.g., promotion name);**

**(iv) Signature of two employees verifying, authorizing, and completing the payout with the customer;**

**(v) Customer's name (for drawings only).**

**(vi) Documentation may be prepared by an individual who is not a table games department employee as long as the required signature is that of the employee completing the payout with the customer.**

**(3) If the promotional cash (or cash equivalent) payout, including those as a result of drawings and giveaway programs, is less than \$600 or the IRS reporting threshold, documentation shall be created to support the bank accountability for which the payout was made. Required documentation consists of a line item on a cage or table games accountability document.**

**Justification:** Proposed revision is intended to define the minimum controls relevant to table game contests or tournaments. Specifically, the rule stipulates the information that must be maintained.

**(o) Contest and tournaments. (1) Entry fees and prize payouts (including mail transactions) shall be summarized on a cash accountability document on a daily basis.**

**(2) Entry fee and payout transactions shall be recorded on a document that includes the following:**

**(i) Customer's name;**

**(ii) Date of entry/payout;**

**(iii) Dollar amount of entry fee/payout (both alpha and numeric, or unalterable numeric) and/or nature and dollar value of any noncash payout;**

**(iv) Signature of individual completing transaction attesting to the receipt or disbursement of the entry fee/payout with the customer; and**

**(v) Name of contest/tournament.**

**(3) Contest/tournament entry fees and payouts shall be summarized and posted to the accounting records on at least a monthly basis.**

**(4) Contest/tournament rules are to be included on all entry forms/brochures or prominently displayed and available for customer review upon request. At a minimum, the rules must include:**

**(i) All conditions customers must meet to qualify for entry into, and advancement through, the contest/tournament;**

**(ii) Specific information pertaining to any single contest/tournament, including the dollar amount of money placed into the prize pool;**

**(iii) The distribution of funds based on specific outcomes;**

**(iv) Name of the organization(s) that conducted the contest/tournament on behalf of, or in conjunction with, the gaming operation, if applicable.**

**(5) Results of each contest/tournament shall be recorded and available for participants to review. The recording shall include the name of the event, date(s) of event, total number of entries, dollar amount of entry fees, total prize pool, and the dollar amount paid for each winning category. The name of each winner shall be recorded and maintained but not available to the participants unless approved by the Tribal gaming regulatory authority.**

**Comment** (January): The time period for which the documentation must be retained is not addressed.

**Response:** Agree. Will incorporate the same retention period as required in 542.13. Modified accordingly.

*Proposed revision as a result of January comment:*

**(6) The gaming operation shall establish a reasonable retention period to maintain the information, which shall be subject to Tribal gaming regulatory authority concurrence.**

**(p) Pool banked table games standards**

**Comment** (March): Concern was expressed that the standards governing pool banked table games could be erroneously applied to progressive table games. Recommend adding clarifying language.

**Response:** Agreed. Modified accordingly.

*Proposed revision as a result of March comment:*

**(p) Pool banked table games standards (Does not apply to progressive table games).**

**(1) All funds won by the pool from customers shall be returned to the players in accordance with the posted rules of the games, which may include:**

**(i) A combination of pool payout and promotional personal property (e.g., car).**

**(ii) A combination of pool payout, bonusing awards and progressive pool may be offered.**

**(2) The conditions for participating in current table game pools, bonusing programs, progressive pots and any related promotions, including drawings and giveaway programs shall be prominently displayed or available for customer review at the gaming operation.**

**(3) Rules governing the conduct of current table game pools shall be conspicuously posted and/or available in writing for customer review. The rules, at a minimum, shall designate:**

**(i) The percentage of winnings to be contributed to the table games pool and, if applicable, the percentage contributed to any other promotional or progressive pots and pools;**

**(ii) How bonusing awards, promotional payouts and progressive pots and pools will be paid out;**

**(iii) How/when the contributed funds are added to the pools and pots;**

**Comment** (January): A lengthy discussion was held in which several issues were raised including:

Concern that standard could require posting of proprietary information

Role of the State in protecting the public's/player's interest

Funds belong to the players and should be returned to them

Casino has a fiduciary responsibility to the players/public

Frequently it is not percentages but number of players that are important

Recommend revising as follows:

**(3) Requirements governing the administration of current table game pools shall be conspicuously posted and/or available in writing for customer review.**

**Requirements, at a minimum, shall include relevant provisions of the Tribal-State compact regarding the administration of table games pools:**

**(i) The percentage of winnings to be contributed to the table games pool and, if applicable, the percentage contributed to any other promotional or progressive pots and pools;**

**(ii) How bonusing awards, promotional payouts and progressive pots and pools will be paid out;**

**(iii) How/when the contributed funds are added to the pools and pots;**

**Response:** Agreed. Modified accordingly.

**(3) Requirements governing the administration of current table game pools shall be conspicuously posted and/or available in writing for customer review.**

**Requirements, at a minimum, shall include relevant provisions of the Tribal-State compact regarding the administration of table games pools:**

**(i) The percentage of winnings to be contributed to the table games pool and, if applicable, the percentage contributed to any other promotional or progressive pots and pools;**

**(ii) How bonusing awards, promotional payouts and progressive pots and pools will be paid out;**

**(iii) How/when the contributed funds are added to the pools and pots;**

**(4) Pool contributions shall not be placed in or near the rake circle.**

**Comment** (January): “Rake” is a poker term, not used in pool-banked table games. Ante is the appropriate term. Recommend revising.

**Response:** Agree. Modified accordingly.

*Proposed revision as a result of January comment:*

**(4) The ante shall not be commingled with the pool funds.**

**(5) The amount (balance) of the pools and pots shall be conspicuously displayed in the table games area.**

**(6) At least once a day, the posted balance of the pools and pots shall be updated to reflect their current amount.**

**(7) At least once a day, increases and decreases to the posted balance of the pools and pots shall be reconciled to the amount received by the cage from the count team by personnel independent of table games.**

**Justification:** Pool table game standards are proposed to ensure gaming operations are effective in accounting for the pool balance and any other promotional progressives or pots to which winnings may be contributed. Additionally, the controls strive to ensure there is minimum disclosure to the public regarding the administration of the pools and pots.

**Comment** (January): A lengthy discussion was held in which the following points were made by the Committee:

- The amount of the pool has no effect on the amount that a player can win on a particular game as that is determined by the table limit.
- Posting the amount of the below may mislead players into believing that they can win that amount.
- It would be difficult to determine the balance of the pool on a daily basis as there are often outstanding expenses to be deducted therefrom.

**Response:** Agree to delete the requirement that the balance be posted. Modified accordingly.

~~**(5) The amount (balance) of the pools and pots shall be conspicuously displayed in the table games area.**~~

~~**(6) At least once a day, the posted balance of the pools and pots shall be updated to reflect their current amount.**~~

~~**(7) At least once a day, increases and decreases to the posted balance of the pools and pots shall be reconciled to the amount received by the cage from the count team by personnel independent of table games.**~~