

MISSOURI GAMING COMMISSION  
MINIMUM INTERNAL CONTROL STANDARDS

TABLE OF CONTENTS

FOREWORD

CHAPTER A: General and Administrative

§ 1. General.....	A-2
§ 2. Internal Control Systems .....	A-4
§ 3. Changes to Class A Licensee’s Internal Controls.....	A-4
§ 4. Types of Changes to Internal Controls .....	A-5
§ 5. Submission of Internal Controls .....	A-6
§ 6. Found Items .....	A-8

CHAPTER B: Key Controls

§ 1. General.....	B-2
§ 2. Procedures.....	B-3
§ 3. Key Access List .....	B-3
§ 4. Key Log .....	B-4
§ 5. Duplicate Keys.....	B-5
§ 6. Broken, Lost or Missing Keys .....	B-5
§ 7. Required Sensitive Keys .....	B-5
§ 8. Proximity Cards Used to Access Sensitive Areas .....	B-6

CHAPTER C: Rules of the Game

§ 1. General.....	C-2
§ 2. Tournaments .....	C-3

CHAPTER D: Table Games (Live Games)

§ 1. Movement or Disposal of Table Games .....	D-3
§ 2. Table Inventory.....	D-3
§ 3. Opening of Gaming Tables.....	D-4
§ 4. Closing of Gaming Tables .....	D-4
§ 5. During 24 Hour Gaming .....	D-5
§ 6. Manual Table Fills .....	D-5
§ 7. Automated Table Fills .....	D-7
§ 8. Manual Table Credits.....	D-8
§ 9. Automated Table Credits .....	D-10
§ 10. Accepting Cash and Match Play Coupons at Gaming Tables .....	D-11
§ 11. Cards and Dice Control.....	D-12
§ 12. Table Layouts .....	D-15
§ 13. Required Personnel .....	D-16

§ 14. Table Games Progressives .....	D-17
§ 15. Instructional Table Games Offered to Public .....	D-17
§ 16. Minimum and Maximum Table Games Wagers.....	D-18
§ 17. Handling Chips .....	D-18
§ 18. Clearing of Hands .....	D-18
§ 19. General.....	D-18

CHAPTER E: Electronic Gaming Devices (EGDs)

§ 1. General.....	E-2
§ 2. Tokenized Machines .....	E-4
§ 3. Hopper Fills .....	E-4
§ 4. Jackpot Payouts.....	E-6
§ 5. Other EGD Occurrences .....	E-10
§ 6. Installation, Location, Conversion and Movement of EGDs.....	E-11
§ 7. Resetting/Clearing the Random Access Memory (RAM) .....	E-13
§ 8. Statistics .....	E-14
§ 9. Critical Program Storage Media (CPSM) Duplication .....	E-15
§ 10. Security of EGD Equipment .....	E-16
§ 11. Slot Wallets.....	E-17
§ 12. Wide Area Progressives.....	E-17
§ 13. Local Progressives .....	E-18
§ 14. Ticket Validation Systems – “Ticket In/Ticket Out” (TITO).....	E-19
§ 15. Redemption Kiosks.....	E-27
§ 16. Promotional Ticket/Coupon Systems .....	E-29

CHAPTER F: Poker Rooms

§ 1. General.....	F-2
§ 2. Supervision .....	F-2
§ 3. Banks and Transactions .....	F-2
§ 4. Drops and Counts.....	F-3
§ 5. Poker Cards.....	F-3
§ 6. Bad Beat Jackpots.....	F-4

CHAPTER G: Drops and Counts

§ 1. General.....	G-2
§ 2. Gaming Table Drop Device Characteristics ..	G-2
§ 3. Emergency Gaming Table Drop Devices .....	G-2
§ 4. EGD Drop Buckets and Compartment Characteristics.....	G-3
§ 5. Emergency EGD Drop Buckets .....	G-3
§ 6. Bill Validator (BV) Characteristics .....	G-4
§ 7. Emergency Bill Validator Drops .....	G-4
§ 8. Collection and Transportation of Drop Devices .....	G-5
§ 9. Soft and Hard Count Room Characteristics.....	G-7
§ 10. Count Standards.....	G-7
§ 11. Weigh Scale Standards (Hard Count) .....	G-9
§ 12. Counting and Recording Hard Count .....	G-10

§ 13. Counting and Recording Soft Count.....	G-12
§ 14. Procedures upon Completion of the Count.....	G-14

CHAPTER H: Casino Cashiering

§ 1. General.....	H-2
§ 2. Location and Functions.....	H-2
§ 3. Imprest Bank Accountability.....	H-3
§ 4. Temporary Banks.....	H-5
§ 5. Main Bank Accountability.....	H-6
§ 6. Redemption Kiosks.....	H-7
§ 7. Even Exchanges.....	H-9
§ 8. Chip and Token Inventories.....	H-9
§ 9. Safekeeping Deposits.....	H-11
§ 10. Check Cashing Privileges.....	H-12
§ 11. Returned Checks.....	H-14
§ 12. Credit or Debit Cards.....	H-15
§ 13. Other Cage Transactions.....	H-15
§ 14. Exchange and Storage of Foreign Chips and Tokens.....	H-16
§ 15. Coupons.....	H-17
§ 16. Ticket In/Ticket Out.....	H-19
§ 17. Inspection of Mechanical Counting Devices.....	H-22

CHAPTER I: Casino Accounting

§ 1. General.....	I-2
§ 2. Locked Accounting Boxes.....	I-2
§ 3. Storage of Unused Pre-Numbered Forms.....	I-2
§ 4. Signature Records.....	I-3
§ 5. Deposit of Admission and Gaming Taxes.....	I-4
§ 6. Complimentaries.....	I-4
§ 7. Procedures for Monitoring and Reviewing Gaming Operations.....	I-5
§ 8. Required Daily Accounting Reviews.....	I-6
§ 9. Table Game Statistics.....	I-11
§ 10. MGC Reporting Requirements.....	I-11
§ 11. Player Tracking and Player Rewards Systems.....	I-12
§ 12. Player Cards.....	I-12
§ 13. Player Rewards.....	I-12

CHAPTER J: Admissions and Ticketing

§ 1. Admission Procedures and Computation of Admission Tax.....	J-2
§ 2. Ticketing.....	J-3

CHAPTER K: Currency Transaction Reporting

§ 1. General.....	K-2
§ 2. Logging Cash Transactions In Excess of \$3,000.....	K-2
§ 3. Reportable Transactions.....	K-3
§ 4. Obtaining and Verifying Identification.....	K-4

§ 5. Circumvention of CTRC Requirements and Suspicious Activity ... K-5

CHAPTER L: Internal Audit

§ 1. General ..... L-2  
§ 2. Required Internal Audits..... L-2  
§ 3. Reporting Guidelines ..... L-7

CHAPTER M: Surveillance

§ 1. General ..... M-2  
§ 2. Surveillance Requirements ..... M-3  
§ 3. Surveillance Room Access and Control ..... M-3  
§ 4. Operations ..... M-4  
§ 5. Records ..... M-5  
§ 6. Chain of Evidence..... M-6

CHAPTER N: Security

§ 1. General ..... N-2  
§ 2. Reporting ..... N-2  
§ 3. Public Safety & Public Order ..... N-2  
§ 4. Casino Access Control ..... N-3  
§ 5. Protection of Assets & Cash and Dice Integrity ..... N-4

SECTION O: Purchasing and Contract Administration

General ..... O-2  
Statement of Policy ..... O-2  
Normal Purchasing Transactions ..... O-2  
Capital Expenditures ..... O-3  
Related Party Transactions ..... O-3  
Classification of Vendors..... O-4

CHAPTER P: Excluded Persons

§ 1. Excluded Persons ..... P-2  
§ 2. Procedures for Exclusion ..... P-2

CHAPTER Q: Disassociated Persons

§ 1. General ..... Q-2  
§ 2. Procedures for Exclusion ..... Q-2  
§ 3. Access to the DAP List ..... Q-4  
§ 4. Discovery of a DAP ..... Q-4  
§ 5. Employees and Self-Exclusion ..... Q-5

CHAPTER R: Forms

§ 1. Forms Index ..... R-2  
§ 2. General ..... R-4  
§ 3. Signatures..... R-4

§ 4. Control of Forms.....	R-4
§ 5. Numbering .....	R-4
§ 6. Voiding Forms .....	R-5
§ 7. Forms Description.....	R-5

**CHAPTER S: Management Information Systems (MIS)**

§ 1. Management Information Systems (MIS) .....	S-2
§ 2. General.....	S-4
§ 3. Physical Access and Maintenance Controls .....	S-5
§ 4. Critical IT System Parameters .....	S-5
§ 5. User Accounts.....	S-7
§ 6. Generic Accounts.....	S-8
§ 7. Service & Default Accounts .....	S-9
§ 8. Critical IT System Backups .....	S-10
§ 9. Recordkeeping .....	S-10
§ 10. Network Security .....	S-11
§ 11. Changes to Production Environment .....	S-12
§ 12. Remote Access.....	S-12
§ 13. In-House Software Development.....	S-13
§ 14 Purchased Software Programs .....	S-13
§ 15. Wireless Networks.....	S-14
§ 16. Compliance Assessments.....	S-15
§ 17. Player Tracking Systems .....	S-15

**CHAPTER T: Tips**

§ 1. Tips, Gifts, and Gratuities.....	T-2
§ 2. Table Game Tips.....	T-2
§ 3. Transportation of Tips .....	T-3

**CHAPTER U: Cashless, Promotional, and Bonusing Systems**

§ 1. Definitions .....	U-2
§ 2. General.....	U-4
§ 3. Criteria for Electronic Gaming Devices .....	U-8
§ 4. Promotional Accounts.....	U-9
§ 5. Wagering Accounts.....	U-10
§ 6. Bonusing Systems.....	U-12

**CHAPTER V: Server-Supported Game Systems**

§ 1. Definition .....	V-2
§ 2. General.....	V-2
§ 3. Criteria for Electronic Gaming Devices .....	V-4