

MISSOURI GAMING COMMISSION
MINIMUM INTERNAL CONTROL STANDARDS
CHAPTER U – CASHLESS AND BONUSING SYSTEMS

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Note: Sections 313.800 through 313.850, RSMo, et seq., and Title 11, Division 45 of the Code of State Regulations establish standards to which Class B licensees must comply. Class B licensees should review these statutes and rules to ensure their ICS include compliance with the requirements set forth. Adopted, effective June 30, 2011. Revised, effective September 30, 2022. Revised, effective July 30, 2025.

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§ 1 General

- 1.01 Definitions for this chapter are addressed in 11 CSR 45-1.090.
- 1.02 If any part of the casino gaming floor has Cashless or Bonusing features available to patrons, the Class B licensee shall ensure a prominent and conspicuous notice is located on the electronic gaming devices (EGDs) denoting which EGDs have these features available to patrons or which EGDs do not have these features available to patrons. Alternatively, if all EGDs on the Class B licensee's gaming floor have these features available to patrons, a prominent and conspicuous notice may be placed at all entrances to the gaming floor in lieu of notices on individual EGDs. At a patron's request, the Class B licensee shall provide printed information outlining information necessary to participate in the Cashless or Bonusing system environments.
- 1.03 The Class B licensee shall allow no more than three failed personal identification number (PIN) entry attempts prior to locking the patron's player reward or wagering account, which would require verification of the patron's valid state or federal government-issued photo identification prior to unlocking the account.
- 1.04 Player reward credits or promotional giveaway credits shall be requested for transfer through the use of a player's reward account. Patron funds shall be requested for transfer through the use of a wagering account or a digital wallet. To initiate a transfer to the game using a player's card, the patron shall be required to independently and confidentially enter his or her secure PIN. The Internal Control System (ICS) shall identify where the PIN is entered. If any other method is used to initiate a transfer to the game, an approved, secure, patron-initiated verification method shall be used as described in the ICS (e.g., application login on a personal device).
- 1.05 The Class B licensee shall maintain all transactions in the Cashless and Bonusing systems for a period of not less than 90 days from the date of the transaction. Any records removed from the system after 90 days shall be stored and controlled in an easily accessible manner approved by the MGC, consistent with the requirements of 11 CSR 45-8.
- 1.06 If online access is provided for patrons to view their account balances or transaction histories from the Cashless system, physical or logical restrictions shall exist to provide independent operation from the Cashless system.
- 1.07 Any EGD exhibiting any meter variances (i.e., CEP In, CEP Out, NCEP In, NCEP Out, WAT In, WAT Out, machine paid external bonus payout, or attendant paid external bonus payout) for three consecutive days shall be removed from service. Once the malfunction has been identified and repaired the EGD may be placed back into service. The Class B licensee shall submit a detailed report to the

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MGC EGD department describing the malfunction and the corrective action taken.

- 1.08 Patrons shall be required to have an active player reward account in order to utilize a cashless system.
- 1.09 Prior to enabling cashless or bonusing functionality on an EGD, the Class B licensee shall ensure the designated Critical Program Storage Media (CPSM) has been approved by the MGC for use with the respective Cashless or Bonusing system.

§ 2. Criteria for Cashless Wagering Transactions at Table Games

- 2.01 Each table game offering cashless wagering transactions shall have an approved device assigned and positioned at the table game to accept wagering transactions. The device shall only be used at the table to which it is assigned. Prior to implementation and every time the table number is changed, the Class B licensee shall verify the correct table number is identified on the Buy-In Drop Ticket, if used, and the address of the table is correct in the system.
- 2.02 The Class B licensee shall describe the procedures in the ICS for purchasing value chips at a gaming table using a wagering account or digital wallet. The procedures shall include the following:
 - (A) How the transaction is initiated;
 - (B) How the transaction is processed by the dealer or boxperson;
 - (C) The means by which the patron confirms the purchase or receives documentation of the purchase; and
 - (D) Whether a Buy-In Drop Ticket evidencing the purchase is printed and deposited in the drop box.
- 2.03 The Class B licensee shall describe the procedures in the ICS for redeeming value chips at a gaming table using a wagering account or digital wallet. The procedures shall include the following:
 - (A) How the transaction is initiated;
 - (B) How the transaction is processed by the dealer or boxperson;
 - (C) The means by which the patron confirms the redemption or receives documentation of the redemption; and
 - (D) Whether a Cash-Out Receipt evidencing the redemption is printed and deposited in the drop box.
- 2.04 If Buy-In Drop Tickets or Cash-Out Receipts are used, they shall include the following information:
 - (A) Time;
 - (B) Date;

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- (C) Player's account number;
 - (D) Dollar amount of the transfer; and
 - (E) Gaming table number.
- 2.05 The dollar amount of the transaction on the Buy-In Drop Ticket, Cash-Out Receipt, or on the approved device shall be clearly legible in the dedicated surveillance coverage of the gaming table where it is printed or displayed.
- 2.06 The Class B licensee shall prepare a Master Gaming Report each gaming day. The count team shall print a report from the cashless system that lists all cashless transactions at table games for the gaming day and if the amounts are not auto-populated to the report, enter these amounts on the Master Gaming Report.

§ 3 Player Reward Accounts and Cards

- 3.01 Player reward account creation at the casino shall be conducted under dedicated surveillance coverage—
- (A) At the players' club by players' club employees;
 - (B) At the cage by cage employees;
 - (C) At the hotel front desk by licensed hotel employees;
 - (D) In the pit by table games supervisors, assistant pit managers, or pit managers; or
 - (E) At the poker room bank/cage by the brush person, poker supervisor, or poker manager.
- 3.02 In order to create a player reward account at the cage, players' club, hotel front desk, poker room bank/cage, or the pit, staff shall examine the patron's state or federal government-issued photo identification and confirm the patron's photo, physical description, and identifying information on the photo identification matches the patron requesting the account. In addition, a search of the List of Disassociated Persons (DAP List) and Excluded Persons List shall be conducted in accordance with MICS, Chapters P and Q. If the person is not on the MGC DAP List or Excluded Persons List, the player reward account can be created and a card printed.
- 3.03 Player reward accounts may be created by patrons under dedicated surveillance coverage at a kiosk. The kiosk shall—
- (A) Use commercially available ID authentication software to verify—
 - (1) The authenticity of the patron's state or federal government-issued photo identification; and
 - (2) The identification is not expired;
 - (B) Conduct an MGC DAP and Exclusion List check using the MGC Web DAP List, the most recently downloaded MGC DAP List and the current

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MGC Excluded Persons List, or flagged accounts in the player tracking system using the following:

- (1) At least the first three (3) letters of the patron's first name;
 - (2) At least the first three (3) letters of the patron's last name; and
 - (3) Date of birth;
- (C) Verify the patron is the person presenting the ID by—
- (1) Using commercially available software to compare the patron's name, address, last four (4) digits of the patron's social security number, and date of the birth to public records to determine that all information matches;
 - (2) Requiring a photo of the patron at the time of the enrollment that is then compared to the photo ID using biometrics to verify the person on the ID is creating the account; or
 - (3) Using another method approved by the MGC; and
- (D) Only create a patron account if all verifications are successful and the person is at least twenty-one (21) years of age.

3.04 To establish a player reward account using a licensee's application or website the system shall—

- (A) Require a patron to—
- (1) Enter an email address;
 - (2) Enter a verification code sent to that email address when prompted by the system;
 - (3) Upload a picture of the front and back of his or her state or federal government-issued photo identification (ID); and
 - (4) Enter the last four (4) digits of his or her social security number;
- (B) Use commercially available ID authentication software to—
- (1) Determine if the ID is valid by comparing the pictures of the ID to stored templates of known acceptable ID types and formats; and
 - (2) Verify the ID is not expired;
- (C) Conduct an MGC DAP and Exclusion List check using the MGC Web DAP List, the most recently downloaded MGC DAP List and the current MGC Excluded Persons List, or flagged accounts in the player tracking system using the following:
- (1) At least the first three (3) letters of the patron's first name;
 - (2) At least the first three (3) letters of the patron's last name; and
 - (3) Date of birth;
- (D) verify the ID belongs to the patron by—
- (1) Using commercially available authentication software to compare the patron's information to known public records to determine if the information provided is consistent with public records;
 - (2) Requiring a time-stamped photo to be submitted within a specified time frame which is then compared to the photo ID using biometrics to confirm the person in the photo is the person requesting the player reward account creation; or

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- (3) Using another method approved by MGC; and
 - (E) Only create a patron account if all verifications are successful and the person is at least twenty-one (21) years of age.
- 3.05 Employees who create player reward accounts or print players' cards shall not be allowed to add or adjust player reward points except for table games supervisors, assistant pit managers, and pit managers who may only add player reward points through rated play documented in a system or on a form identified in the licensee's ICS and poker supervisors or poker managers who may only add player reward points by recording a patron's poker session.
- 3.06 Notwithstanding MICS, Chapter U § 3.01, Compliance personnel may create player reward accounts in the player tracking system to flag accounts for new Disassociated Persons, Excluded Persons, persons evicted by the property, or gaming-prohibited persons.
- 3.07 Player cards for new patrons shall not be distributed by mail. Class B licensees may distribute player cards to existing player reward members who have already received a player card and have achieved the next tier level by mail.
- 3.08 Prior to printing a player's card for a patron with an existing account, the player's club employee, cage employee, hotel front desk employee, table games supervisor, assistant pit manager, pit manager, brush person, poker supervisor, or poker manager shall—
 - (A) Require the patron to present a valid state or federal government-issued photo identification and confirm the identification matches the physical characteristics of the person presenting the identification; and
 - (B) Verify the patron is not on the MGC DAP List or Excluded Persons List as required by MICS, Chapters P and Q.
- 3.09 The Class B licensee may allow a patron to print a player's card at a kiosk if the card is for an existing player reward account and the kiosk uses commercially available ID authentication software to verify the patron's identification and requires the patron to enter his or her established PIN. If the patron is on the MGC DAP List or Excluded Persons List, the kiosk shall not allow the patron to print the card.
- 3.10 Player reward account PINs shall only be established at the cage or players' club with the assistance of a cage or players' club employee who does not have the ability to add player reward points or redeem player reward points. The following procedures shall be followed when establishing a PIN for a patron's player reward account at the cage or players' club:
 - (A) The employee shall require the patron to present a valid state or federal government-issued photo identification;

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- (B) The employee shall verify the photo on the identification matches the physical characteristics of the patron presenting the photo identification;
 - (C) The employee shall conduct a search of the MGC DAP List and Excluded Persons List in accordance with MICS, Chapters P and Q; and
 - (D) The patron shall independently and confidentially enter a secure PIN a minimum of two (2) times. The PIN entries shall successfully match.
- 3.11 Should a patron choose to change a known PIN at any time, the patron must successfully enter the existing PIN followed by an entry of the new PIN a minimum of two (2) times.
- 3.12 The Class B licensee shall ensure the following procedures are performed when resetting a patron's PIN when the existing PIN is unknown:
- (A) A cage employee, player's club employee, or casino host who does not have the ability to add player reward points or redeem player reward points shall reset the PIN at the cage or player's club area after confirming the patron's valid state or federal government-issued photo identification matches the physical characteristics of the person presenting the identification and respective fields (i.e., name, date of birth, photo identification type, and number) in the player reward system; and
 - (B) The patron will be required to independently and confidentially enter the new PIN a minimum of two (2) times. The PIN entries shall successfully match.
- 3.13 PINs shall not be accessible to any employee of the Class B licensee. PINs shall be masked from view in the computer system.

§ 4 Player Rewards and Promotional Giveaways

- 4.01 The Class B licensee shall provide patrons with information regarding the reward structure and player reward point value upon request.
- 4.02 Employees capable of adding player reward points shall not be allowed to redeem player reward points.
- 4.03 Only supervisors or above shall have the ability to void player reward point redemptions in the system.
- 4.04 Player reward point redemption procedures shall require a proper segregation of duties. Employees who have access to gaming assets, including cash, tokens, chips, or tickets, shall not be able to generate the source documentation used to process player reward point redemptions.

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- 4.05 Additions of player reward points to a player's account, including from player ratings, other than through actual EGD play shall be documented. Documentation shall include the following:
- (A) Time;
 - (B) Date;
 - (C) Amount of the player reward points added;
 - (D) Reason for the addition; and
 - (E) Name of the employee who requested the addition.
- 4.06 Redemption of player reward points for a good or service shall be recorded on the source document at the full retail price normally charged for the good or service.
- 4.07 Prior to a patron receiving anything of value when redeeming player reward points from the player rewards system, the patron shall be required to—
- (A) Present a valid state or federal government-issued photo identification;
 - (B) Enter his or her player reward PIN; or
 - (C) Log in to an established online player account using his or her user name and password.
- 4.08 The kiosks used for player reward points-to-cash redemptions shall comply with the requirements set forth for ticket redemption kiosks in the MICS.
- 4.09 Patron complaints of unauthorized use of player rewards shall be investigated by the Class B licensee. The Class B licensee shall notify the MGC of the complaint in writing.
- 4.10 Promotional product giveaways shall not be conducted in the cage.

§ 5 Use of Player Reward Accounts for Downloadable Credits

- 5.01 Promotional giveaway credits established in the promotional system shall comply with 11 CSR 45-5.181.
- 5.02 Should the Class B licensee elect to utilize a promotional system, the system shall prompt the patron to enter his or her PIN prior to displaying the amount of the available promotional giveaway credits and player reward credits.
- 5.03 Upon card out, all non-wagered NCEP credits shall be uploaded to the patron's player reward account for future use. Should the Cashless system become inoperable, the Class B licensee shall in the ICS establish procedures for handling non-wagered NCEP credits.
- 5.04 The addition of promotional giveaway credits to an individual patron's account, at any time other than when a previously approved promotion is being initially

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loaded into the system, shall be issued only by occupational licensees as designated in the ICS. Only these authorized job positions shall have system access to perform this function. The issuance of these credits shall be documented, including the patron's name, patron's account number, the amount of the credits, the explanation for the issuance, and the name of the individual issuing the credits. A daily report shall be generated from the system listing all of the additions, including the required information.

- 5.05 Any manual adjustments of player reward credits (e.g. player reward points) to an individual patron's account shall only be performed by occupational licensees who do not have system access to create accounts. These adjustments shall be documented, including the patron's name, patron's account number, the amount of the adjustment, the explanation for the adjustment, and the name of the individual performing the adjustment. A daily report shall be generated from the system listing all of the adjustments, including the required information.
- 5.06 The Class B licensee shall be responsible for all promotional giveaway credits and player reward credits placed in a patron's player reward account. Once placed in a patron's player reward account, a Class B licensee may only remove those promotional giveaway credits and player reward credits—
- (A) When they have expired or have been redeemed;
 - (B) When the patron has been added to the DAP List or Excluded Persons List;
 - (C) To immediately correct an entry error to a patron's account;
 - (D) To correct player reward credits due to a runaway meter;
 - (E) To correct a redemption that failed to register in the system;
 - (F) When a patron has self-excluded at a sister property;
 - (G) To merge player reward accounts; or
 - (H) With MGC approval.

§ 6 Wagering Account and Digital Wallet Transactions

- 6.01 The Class B licensee utilizing wagering account transfers shall establish "terms and/or conditions" (Notice) for wagering accounts prior to activating the Cashless system modules. Patrons participating in the Cashless system shall receive a copy of the Notice upon the establishment of an account or activation of the wagering account, and upon request. The Notice, at a minimum, as applicable, shall include the disclosures as required by federal law.
- 6.02 If a patron establishes a wagering account online, the process shall require the patron to do so by accessing his or her active player reward account online and providing, at a minimum, his or her—
- (A) Legal name;
 - (B) Date of birth;

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- (C) Email address;
 - (D) Physical address;
 - (E) Social security number/tax ID number; and
 - (F) Phone number.
- 6.03 If a patron requests assistance to establish a wagering account at the Class B licensee, a cage employee at the cage or a ticketing employee at the player's club shall—
- (A) Require patrons to present valid, non-expired state or federal government-issued photo identification and player's card;
 - (B) Verify the photo on the identification matches the physical characteristics of the patron presenting the photo identification;
 - (C) Verify the patron is not a DAP or Excluded Person; and
 - (D) Require the patron to establish his or her PIN if it has not already been established. The patron shall independently and confidentially, through the use of a shadow box or other MGC approved method, enter a secure PIN a minimum of two times. The PIN entries shall successfully match.
- 6.04 Employees of the Class B licensee shall not have system access to create digital wallets for patrons or to create or reset a patron's digital wallet PIN.
- 6.05 The Class B licensee shall identify the job positions authorized to reset PINs for wagering accounts in the ICS. The Class B licensee shall perform the following minimum functions when "resetting" a patron's wagering account PIN:
- (A) The employee, who does not have the ability to conduct wagering account transactions, shall confirm the patron's valid state or federal government-issued photo identification matches the physical characteristics of the person presenting the identification and respective fields (i.e., name, date of birth, photo identification type, and number) in the system; and
 - (B) The patron will be required to independently and confidentially, through the use of a shadow box or other MGC approved method, enter the new PIN a minimum of two times. The PIN entries shall successfully match.
- 6.06 To conduct a wagering account or digital wallet deposit at the cage—
- (A) The patron shall initiate the transaction at the cage by presenting the chips or funds for deposit;
 - (B) The cashier shall require the patron to present a valid state or federal government-issued photo identification and confirm the identification matches the physical characteristics of the person presenting the identification;
 - (C) The cashier shall verify the patron is not a DAP or Excluded Person;
 - (D) The cashier shall locate the patron's wagering account or digital wallet in the system and confirm the identification is linked to the account or wallet;

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- (E) The cashier shall spread the funds or chips on the counter in view of Surveillance;
 - (F) The cashier shall count the funds and shall deposit an equivalent amount of funds in the patron's wagering account or digital wallet in the system; and
 - (G) The cashier shall print a receipt from the system for the patron documenting the amount, date, and time of the transaction or the transaction shall display on the patron's personal device.
- 6.07 To conduct a wagering account or digital wallet withdrawal at the cage—
- (A) The patron shall initiate the transaction at the cage by requesting a withdrawal from his or her wagering account or digital wallet;
 - (B) The cashier shall require the patron to present a valid state or federal government-issued photo identification and confirm the identification matches the physical characteristics of the person presenting the identification;
 - (C) The cashier shall verify the patron is not a DAP or Excluded Person;
 - (D) The cashier shall locate the patron's wagering account or digital wallet in the system and confirm the identification is linked to the account or wallet;
 - (E) The cashier shall withdraw the requested amount of funds from the patron's wagering account or digital wallet and spread an equivalent amount of funds on the counter in view of Surveillance; and
 - (F) The cashier shall print a receipt from the system for the patron documenting the amount, date, and time of the transaction or the transaction shall display on the patron's personal device.
- 6.08 Surveillance shall have the ability to verify cashless transactions performed at the cage using at least one of the following methods:
- (A) System access to view cash withdrawals and deposits in real-time;
 - (B) System generation of a receipt for the patron which shall be placed on the counter face up to ensure surveillance coverage of the amount is obtained; or
 - (C) Surveillance coverage of the cashier's computer screen sufficient to view the transactions.
- 6.09 The Class B licensee shall ensure funds from wagering accounts or digital wallets are only deposited or withdrawn from devices approved by the MGC (i.e., EGDs, table games, or kiosks).
- 6.10 Any funds remaining in a patron wagering account which is abandoned or unclaimed shall be disposed of in accordance with the Uniform Disposition of Unclaimed Property Act, sections 447.500 et seq, RSMo.

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- 6.11 The Class A or B licensee who holds the patron's wagering account funds shall maintain liability for the funds until the patron's wagering account has a zero (0) balance. A patron's wagering account shall not be allowed to have a negative balance.
- 6.12 The system shall be configured to upload to the patron's wagering account or digital wallet all non-wagered credits upon a card out or a break in connection between the player's mobile device and the EGD or the Cashless system. Should the Cashless system become inoperable, the Class B licensee shall, in the ICS, establish procedures for handling non-wagered wagering account and digital wallet credits.
- 6.13 The Class B licensee shall immediately notify the MGC agent on duty of any—
- (A) Incident of a suspicious transaction(s) involving a wagering account or digital wallet;
 - (B) Evidence that a player's card has been counterfeited, tampered with, or altered in any way which would affect the integrity or suitability of the card;
 - (C) Evidence that a wagering account or digital wallet has been tampered with or fraudulently altered in any way; and
 - (D) Evidence that a wagering account or digital wallet has been fraudulently created.
- 6.14 The Class B licensee shall include procedures for accepting and investigating patron complaints involving wagering accounts and complaints involving digital wallet transactions that occurred at the property in the ICS. The on-duty MGC agent shall be notified in writing of any dispute which has not been resolved within two (2) banking days of receipt. Documentation of these unresolved disputes and the resolution shall be maintained by the Class B licensee.
- 6.15 The Class B licensee shall, upon patron request with proper identification, provide the patron immediate on-demand access to his or her 30-day wagering account transactions or digital wallet transactions that occurred at the property. If the patron requests additional transaction history beyond the 30 days, the Class B licensee shall provide the information within seven (7) calendar days. The report shall include the—
- (A) Patron's account number and name;
 - (B) Class B licensee name, city, and state at which the report was generated;
 - (C) Detailed transaction history that occurred, including—
 - (1) Date of the transaction(s);
 - (2) Time of the transaction(s);
 - (3) Location at which the transaction(s) occurred (e.g., EGD location, EGD asset number, table game, kiosk location, etc.);
 - (4) Amount of the transaction(s); and

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- (5) Direction of the transaction(s); and
 - (D) Summary balance of each account.
- 6.16 No wagering account or digital wallet transactions shall be voided by employees of the Class B licensee. Instead, the occupational licensee shall in the presence of the patron perform a supplemental transaction to correct the error.
- 6.17 Adjustments to digital wallets shall not be performed by employees of the Class A or Class B licensee.
- 6.18 Necessary adjustments made to a patron's wagering account without the patron present, other than those made during Accounting's daily audit, shall be made only by authorized occupational licensees, as designated in the ICS. These adjustments shall be documented including the patron's name, patron's account number, the amount of the transaction, the explanation for the adjustment, and the name of the individual issuing/authorizing the adjustment. A daily report shall be generated from the system listing all of the adjustments. If this daily report cannot be generated from the system, the ICS shall include the procedures for how adjustments will be identified in the system. The Accounting department shall conduct a daily audit of these post-transactional adjustments to verify that all of the required information is present and to detect and investigate any unusual adjustments. The results of the investigation shall be documented. The patron shall be notified of any adjustment made to the patron's wagering account.
- 6.19 If wagering account and digital wallet transactions are permitted on hybrid table game player terminals that use the WAT-Out meter for reporting dealer tips, the Class B licensee shall describe the procedures for reporting dealer tips separately from WAT-Out transactions in the AGR calculation. Wagering account and digital wallet transactions on hybrid table game player terminals shall comply with accounting procedures for EGD wagering account and digital wallet transactions.
- 6.20 The Class B licensee shall maintain a record of all wagering account and digital wallet transactions that occurred at the property for no less than five (5) years from the last date of account activity.

§ 7 Bonusing Systems

- 7.01 System bonuses are promotional awards that shall be metered and taxed whether paid to the game or paid by an attendant. System bonuses that are cashed out or paid by an attendant shall be deducted from AGR.
- 7.02 The Class B licensee shall have dated, written rules for each bonusing campaign in accordance with 11 CSR 45-5.181.

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- 7.03 System bonuses shall not be utilized when calculating the theoretical payback percentage of individual EGDs.
- 7.04 In accordance with federal regulations, any bonus payout of \$600 or more shall require a 1099 MISC to be completed. Bonus payouts shall not be combined with gambling game payouts reported on a W-2G.
- 7.05 At the conclusion of each bonusing life cycle, Accounting shall run system reports to determine whether the bonus(es) was awarded as required by the promotional rules of the bonusing campaign. If a bonus fails to be awarded, the MGC EGD department shall be notified within 48 hours.
- 7.06 Bonuses shall not be awarded based on the outcome of a gambling game.
- 7.07 Bonusing campaigns shall not be multi-jurisdictional.