

**Title 11—DEPARTMENT OF PUBLIC SAFETY**  
**Division 45—Missouri Gaming Commission**  
**Chapter 9—Internal Control System**

**ORDER OF RULEMAKING**

By the authority vested in the Missouri Gaming Commission under section 313.805, RSMo Supp. 2014, the commission amends a rule as follows:

11 CSR 45-9.108 is amended.

A notice of proposed rulemaking containing the text of the proposed amendment was published in the *Missouri Register* on September 1, 2016 (41 MoReg 1078). Changes have been made to the text of the proposed revision of the *Minimum Internal Control Standards* (MICS) as incorporated by reference in Chapter H, and those changes are explained below. Changes have been made to the text of the proposed amendment, so it is reprinted here. This proposed amendment becomes effective thirty (30) days after publication in the *Code of State Regulations*. SUMMARY OF COMMENTS: A public hearing was held on this proposed amendment on October 4, 2016. No one attended the public hearing. Three written comments were received.

COMMENT #1: H § 3.14—Mike Winter with the Missouri Gaming Association stated “This change would significantly impact guest service. By limiting a property's ability to allow front line cashiers the ability to create a paid-in / paid-out a property will not be able to pay out guest disputes from the front line window. This will add significant time into the process and increase guest frustration.”

RESPONSE: No change was made to the standard. The standard already allows for the creation of a paid-out by the cashier for redemption kiosk disputes. Allowing a cashier to create documentation that enables the window to balance introduces risk into this process. Therefore, the reasons for creating this documentation need to be limited. Each casino has the option of having a floating employee window accessible to the floor, if the main bank is not accessible to handle these types of transactions that do not result in an even exchange or the exchange of documentation created by an independent source.

COMMENT #2: H § 7.02—Jamie Doss with Isle of Capri Boonville stated “We recommend that if a BV can is removed/added from a redemption kiosk that it not trigger the requirement to be counted down and reconciled within 24 hours. The BV cans fill up quickly on the weekends with currency and e-tickets. There is minimal risk by removing the BV can when the currency cassettes remain untouched. Anytime a currency cassette is removed or added, the kiosk will be counted down and reconciled within 24 hours as required.”

RESPONSE AND EXPLANATION OF CHANGE: Staff agreed with this recommendation. MICS Chapter H § 7.02 was revised to read— “If at any time, additional currency is added to or any currency is removed from the redemption kiosk's cassettes or a cassette is replaced, the kiosk shall be counted down and reconciled within 24 hours.”

COMMENT #3: H § 8.04—Mike Winter with the Missouri Gaming Association stated “This will impact a property's ability to service guests in a timely manner. As an example, in the event of a cashier running out of a specific currency due to a large payout, cashiers can complete a funds transfer to replenish the bank until a transfer from main bank is completed. The risk associated with this process is mitigated since a transfer sheet is utilized and a paper trail is created.”

RESPONSE AND EXPLANATION OF CHANGE: MICS Chapter H § 8.04 was revised to read—“Exchanges shall not be conducted between cage frontline windows, except for even exchanges of currency.”

### **11 CSR 45-9.108 Minimum Internal Control Standards (MICS)—Chapter H**

(1) The commission shall adopt and publish minimum standards for internal control procedures that in the commission’s opinion satisfy 11 CSR 45-9.020, as set forth in *Minimum Internal Control Standards* (MICS) Chapter H—Casino Cashiering and Credit, which has been incorporated by reference herein, as published by the Missouri Gaming Commission, 3417 Knipp Dr., PO Box 1847, Jefferson City, MO 65102. Chapter H does not incorporate any subsequent amendments or additions as approved by the commission on October 26, 2016.