

TITLE 11—DEPARTMENT OF PUBLIC SAFETY
Division 45—Missouri Gaming Commission
Chapter 20—Sports Wagering

PROPOSED RULE

11 CSR 45-20.390 Internal Control System Requirements

PURPOSE: This rule establishes the requirements for the internal control system.

(1) The internal control system shall include a detailed narrative description of the licensee's sports wagering, administrative, and accounting procedures, including without limitation, separate sections comprehensively describing the specific procedures that the licensee will follow in meeting the requirements of this chapter. The internal control system shall include at a minimum the following topics:

(A) An organizational chart depicting appropriate segregation of sports wagering functions and responsibilities;

(B) A description of the duties and responsibilities of each job position shown on the organizational chart;

(C) A detailed, narrative description of the administrative and accounting procedures designed to satisfy the requirements of this chapter. Additionally, this description shall include a separate section for the following:

1. Access control, including:

A. General – location and physical access; and

B. Sensitive key procedures;

2. Conduct of wagering, including:

A. Wagering and payout procedures;

B. Definition of obvious errors;

C. Methods by which the licensee will identify and cancel or void wagers, including logging all cancelled and voided wagers;

D. Procedures to review the accuracy and timeliness of any data feeds used to offer or settle wagers;

E. Payout procedures when the sports wagering system or kiosk fails;

F. Effect of schedule changes of events and what constitutes a material change in the determination of cancelling a wager; and

G. Statistics;

3. Rules of wagering, including:

A. What may be wagered upon; and

B. Establishing lines or payout odds;

4. Wagering equipment, including:

A. Access and computer monitoring procedures;

B. Point of sale devices;

C. Kiosks;

D. Location, conversion, and movement of kiosks;

E. Suspected defective or malfunctioning equipment procedures, including when a ticket or voucher fails to print; and

- F. Procedures for the disposal of sports wagering equipment;
- 5. Kiosk fill and counts, including the:
 - A. Fill process;
 - B. Drop process, including emergency drops;
 - C. Process for counting and recording drops, including emergency drops;
 - D. Description of where the counts are conducted (i.e. count room or vault); and
 - E. Manual count procedures in the event of equipment failure;
- 6. Cashiering, including:
 - A. Layout and physical characteristics of the sportsbook cage;
 - B. Transportation of cash and cash equivalents to and from the sportsbook cage;
 - C. Procedures for each type of transaction conducted at the sportsbook cage, including credit card, debit card, gift card, reloadable prepaid card, ACH transfer, and wire transfer;
 - D. Procedures for the acceptance of wagers at the sportsbook cage;
 - E. Procedures for payout of winning tickets;
 - F. Procedures for redeeming vouchers;
 - G. Procedures for redemption of lost tickets and vouchers;
 - H. Procedures for reprinting tickets and vouchers;
 - I. Procedures for fills to ticket writer's drawer;
 - J. Procedures for the reconciliation of assets and documents contained in a ticket writer's drawer;
 - K. Procedures for the reconciliation of assets and documents contained in kiosks;
 - L. Sportsbook cage accountability; and
 - M. Vault accountability;
- 7. Tips, including:
 - A. Physical characteristics of tip boxes;
 - B. Transportation of tip boxes to and from writer stations; and
 - C. Procedures for accepting tips or gratuities;
- 8. Mobile wagering, including:
 - A. Procedures for creating, activating, adjusting, suspending, deactivating, and flagging sports wagering accounts;
 - B. Identity verification, including a description of the methodology for remote multi-source authentication;
 - C. Online sports wagering platform description, including a description of and the inter-relationships and dependencies between the online sports wagering platform and the sports wagering system and all integrated supplier modules and security features and integrated third-party systems;
 - D. Method for establishing a patron's geographic location, including a description of the geolocation system used;
 - E. Identity protection;
 - F. Fraud prevention;
 - G. Description of methods used by a patron to fund an online sports wagering account;
 - H. Contested transaction procedures;
 - I. Patron terms and conditions;
 - J. Methods for a patron to withdraw funds from his or her account;
 - K. Procedures for adjustments to a patron's account; and

L. Procedures for closing or temporarily suspending a patron's account by the licensee and the patron, including procedures for unsettled wagers;

9. Accounting, including:

- A. Accounting records;
- B. Controls over locked accounting box(es);
- C. Procedures for monitoring and reviewing wagering operations;
- D. Monthly reporting requirements; and
- E. Mail-in ticket procedures;

10. Procedures for federal cash transaction reporting, including:

A. A description of the process for accepting multiple wagers from one patron in a twenty-four (24) hour cycle; and

B. The process used to identify patron structuring of wagers to circumvent recording and reporting requirements;

11. Procedures for suspicious activity reporting, including:

- A. Financial activity; and
- B. Wagering activity;

12. Internal Audit, including:

- A. Required internal audits; and
- B. Reporting guidelines;

13. Surveillance, including:

- A. Surveillance room access and control;
- B. Surveillance system description;
- C. Camera outage procedures; and
- D. Surveillance reports;

14. Security, including:

- A. Case number system/incident reports;
- B. Lost casino access badges;
- C. Power failure;
- D. Enforcement of wagering restrictions for prohibited persons; and
- E. Handling of emergencies;

15. Promotions, including:

A. Procedures for the issuance and control of free play and other promotional offers;

B. Procedures for redemption of free play and other promotional offers that are redeemed to place wagers; and

C. Procedures for redemption of promotional offers other than those used to place wagers;

16. Responsible gaming, including:

A. Methods for securely implementing the self-exclusion program for sports wagering;

B. Plan for removing persons on the List of Self-Excluded Persons (SEP List) from advertising and marketing offers;

C. Plan for using commercially and technologically reasonable methods to ensure that marketing and advertisements do not purposely target persons on the SEP List;

D. Plan for denying access to sports wagering activities to persons on the SEP List; and

E. Description of training programs offered related to responsible gaming;

17. Layoff bets, including:

- A. Procedures for recording and auditing; and
- B. Procedures for initiating a request and entering an agreement;

18. Information technology, including:
- A. Sports wagering system user access controls;
 - B. Procedures for resetting patrons' PINs or passwords;
 - C. List of positions that have system access to view full validation numbers of tickets and vouchers;
 - D. Change management procedures; and
 - E. Procedures for responding to, monitoring, investigating, resolving, documenting, and reporting security incidents associated with information technology systems;
19. Forms, including:
- A. Description of each form mentioned in the licensee's internal control system, including the name and required fields; and
 - (D) Other items the commission may require.

AUTHORITY: section 39(g) of Article III, Mo. Const., sections 313.004 and 313.800–313.850, RSMo 2016 and Supp. 2024. Original rule filed May 14, 2025.

PUBLIC COST: This proposed rule will not cost state agencies or political subdivisions more than five hundred dollars (\$500) in the aggregate.

PRIVATE COST: This proposed rule will not cost private entities more than five hundred dollars (\$500) in the aggregate.

*NOTICE OF PUBLIC HEARING AND NOTICE TO SUBMIT COMMENTS: Anyone may file a statement in support of or in opposition to this proposed rule via email to MGCPolicy@mgc.dps.mo.gov, or by mail to the Missouri Gaming Commission, Policy Section, PO Box 1847, Jefferson City, MO 65102. To be considered, comments must be received within thirty (30) days after publication of this notice in the **Missouri Register**. A public hearing is scheduled for July 17, 2025, at 10:00 a.m., in the Missouri Gaming Commission's Hearing Room, 3417 Knipp Drive, Jefferson City, MO.*