

State of Nevada
Gaming Control Board

Auditor's Name and Date

CPA MICS Compliance Checklist

INFORMATION TECHNOLOGY
MICS #1 - #57

Licensee _____ Review Period _____

NGC Regulation 6.090(9) requires the CPA to use "criteria established by the chairman" in determining whether a Group I licensee is in compliance with the Minimum Internal Control Standards (MICS). This checklist is to be used by the CPA in determining whether the licensee's information technology operation is in compliance with the Information Technology MICS.

Gaming Department: _____

Date of Inquiry	Person Interviewed	Position

Manufacturer and Model Type of System in Use	Period in Use

Checklist Completion Notes:

- 1) Unless otherwise instructed, examine a completed document for compliance for those questions referring to records/documentation and recalculating where appropriate. Indicate (by tickmark) whether the procedures were confirmed via examination/review of documentation, through inquiry of licensee personnel or via observation of procedures. Tickmarks used are to be defined at the bottom of each page.
- 2) All "no" answers require referencing and/or comment, and should be cited as regulation violations, unless adequate alternative procedures exist (i.e., approval of alternative procedure granted by the Board Chairman, including computerized applications) or the question requires a "no" answer for acceptability. All "N/A" answers require referencing and/or comment, as to the reason the MICS is not applicable.
- 3) "(#)" refers to the Minimum Internal Control Standards for Information Technology, Version 7.
- 4) The checklist may be completed by an information technology (IT) specialist. Alternatively, the results an IT specialist's work during related audit procedures performed (e.g., Sarbanes-Oxley procedures) may be utilized. The procedures performed through the use of an IT specialist is identified as such by documenting in the checklist.
- 5) The questions on this checklist relating to MICS #'s 1-28 must be addressed for each gaming department application and entertainment application, if applicable. The completed checklist must clearly demonstrate that all applications were addressed and to what specific applications any exceptions noted apply.

Minimum Internal Control Standard Notes

Note 1: Unless otherwise specified, all Information Technology (IT) MICS apply to gaming and entertainment tax related applications, and the underlying databases and operating systems. Entertainment tax related applications include systems used to record admission ticket sales and point-of-sale systems used to record food, beverage, merchandise, admission and

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any other sales subject to live entertainment tax. If a person or entity other than the licensee offers entertainment subject to the entertainment tax on the licensee's premises ("operator"), the entertainment tax related application being used by such operator to report entertainment revenue shall be compliant with the IT MICS.

Note 2: The IT MICS do not apply when an IT service provider (including an affiliate of an operator) is engaged by a licensee/operator to operate an entertainment tax related application/system (box office system or point-of-sale ["POS"] system) for handling and recording live entertainment taxable admission sales or food, beverage ("F&B") and merchandise sales. To further clarify, the IT MICS do not apply when:

- The licensee/operator has only installed the user terminals to record live entertainment taxable admission, F&B, merchandise and any other sales and to print the related reports for the recorded sales; and
- The administrative functions for the computerized box office system or POS are being performed by an IT service provider.

Note 3: The IT MICS do not apply to the licensee's use of a Board approved pari-mutuel system.

Note 4: The types of gaming and entertainment tax related applications (including version numbers used) and the procedures and records used to comply with IT MICS #1 - #28, as applicable, must be addressed in detail in each applicable section, including the entertainment section, of the written system of internal control pursuant to Regulation 6.090. The Information Technology section of the written system of internal control pursuant to Regulation 6.090 includes the procedures and records used to comply with IT MICS #29 - #57, as applicable. Alternatively, pursuant to the *NGC Regulation 6.090 Written System of Internal Control Policies*, the IT section of the written system of internal control may include the records and procedures used to comply with all IT MICS (#1 - #57); however, it must address and clearly distinguish the related application by revenue section, as applicable (or designate n/a if not applicable).

Note 5: If an IT service provider is used for gaming and entertainment tax related applications, including the underlying databases and operating systems, the licensee's written system of internal control pursuant to Regulation 6.090 is to identify the IT service provider and is to delineate the IT functions performed by the IT service provider to comply with IT MICS. The licensee remains ultimately responsible to ensure the proper design and implementation of the procedures required to meet all applicable IT MICS, regardless of who is performing the IT function.

Note 6: Definitions. The following terminology and respective definitions are used in these MICS unless the context requires otherwise:

Backup system log is an event, a job log or an activity file created by the program or batch process that performs backups of application and data files. These event logs, job logs or activity files usually provide detail on the type of backup performed, success or failure of the operation, and a list of errors.

Critical IT systems and equipment includes all components of systems hardware and software, application software, and database software that individually or in combination are necessary for the stable operation of gaming and entertainment systems. The term does not include user terminals.

Default accounts are user accounts with predefined access levels usually created by default at installation for operating systems, databases, and applications. These accounts tend to be used for training purposes.

Generic user accounts are user accounts that are shared by multiple users (using the same password) to gain access to gaming and entertainment systems and applications. User accounts established by/for and used by manufacturers of the system for vendor support purposes are not considered to be generic accounts.

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Group membership (group profile) is a method of organizing user accounts into a single unit (by job position) whereby access to application functions may be modified at the unit level and the changes take effect for all user accounts assigned to the unit. A user account may be assigned to one or more groups.

Hosting center is an entity unaffiliated with a licensee, registered with the Board pursuant to Regulation 5.230, and hosting on its premises any part(s) of Board regulated hardware or software.

IT personnel are employees of the licensee/operator or an IT service provider who are independent of the gaming and entertainment department; and have been designated to perform the information technology function for the operation of critical IT systems and equipment. The term is not limited to employees within an IT department.

IT service provider, for gaming systems, is a person or an entity engaged by the licensee, and licensed pursuant to Regulation 5.240, to provide management, including system administration, user access administration, support, security, or disaster recovery services for Board regulated hardware or software. For live entertainment, an IT service provider may be engaged by a licensee/operator to administer an entertainment tax related application/system (box office system or POS system) for handling and recording live entertainment taxable admission, F&B, merchandise and any other sales.

Physical and logical segregation of the development and testing from the production environment is separating the development and testing of new software in an environment that is isolated from the regular production (live) network. The development environment is located on a separate server and developers are precluded from having access to the production environment.

Secured repository is a secured environment that is used to store software source code once it has been approved for introduction into the production (live) environment. The repository is secured such that developers cannot modify code once it has been stored. In this way, the repository provides a history of a given software system order by version.

Service accounts are accounts on which automated system functions (services) are dependent to execute. A service account does not correspond to an actual person. These are often built-in accounts that an automated system function (service) uses to access resources they need in order to perform its activities. However, some automated functions may require actual user accounts to perform certain functions, and may be employed using domain accounts to run services.

System administrator is the individual(s) responsible for maintaining the stable operation of the IT environment (including software and hardware infrastructure and application software) and/or has system authorization/access to perform the following administrative function(s):

- Add, change, or delete user accounts and associated user provisioning for database, operating system, and network layers (may also include user access administrator function for an application layer);
- Modify operating system, database, and application security and policy parameters;
- Add, change, or delete system exception logging information; or
- Add, change, or delete permissions to data files and folders.

User access administrator is the individual(s) responsible for and has system authorization/access to add, change, or delete user accounts and associated user provisioning. User provisioning consists of assigning application functions matching the employee's current job responsibilities, unless otherwise authorized by management personnel, to ensure adequate separation of duties.

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Vendor supported system is one type of critical IT systems and equipment; however, where the source code is supported solely by the manufacturer of such system. The manufacturer support of source code does not include performing the function of a “system administrator” or a “user access administrator” when the system is in use by the licensee.

Questions	Yes	No	N/A	Comments, W/P Reference
1. Has the licensee’s written system of internal control for information technology and for information technology for each gaming department and entertainment, if applicable, been read prior to the completion of this checklist to obtain an understanding of the licensee’s information technology procedures?				
<u>Physical Access and Maintenance Controls</u>				
2. Are the critical IT systems and equipment for each gaming application (e.g., keno, race and sports, slots, cashless wagering systems, etc.) and each application for entertainment maintained in a secured area (secured area includes a hosting center)? (1) Verify by observation.				
3. Is the area housing the critical IT systems and equipment for each gaming and entertainment application and other critical IT systems and equipment equipped with the following:				
a. Redundant power sources to reduce the risk of data loss in case of interruption of power? (1a) Note: MICS 1(a) does not apply to components in the slot gaming device cabinet. (1a)				
b. Adequate security mechanisms, such as traditional key locks, biometrics, combination door locks, or an electronic key card system to prevent unauthorized physical access? (1b)				
c. The administration of the electronic security systems, if used to secure areas housing gaming and entertainment critical IT systems and equipment, are performed by personnel independent of a gaming or entertainment department? (1c)				
4. Does the written system of internal control delineate the methods, processes and practices used in meeting the requirements of MICS #1 (a through c)? (1, Note)				

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5. Is access to areas housing critical IT systems and equipment for gaming and entertainment applications, excluding vendor supported systems, restricted to authorized IT personnel? (2)				
6. Are gaming and entertainment department personnel, including the manufacturers of the gaming and entertainment computer equipment, only allowed access to the areas housing critical IT systems and equipment for gaming and entertainment applications, excluding vendor supported systems, when authorized by IT personnel and with periodic monitoring by IT personnel during each access? (2)				
7. Is a record of each access described in the previous standard by non-IT personnel maintained and includes at a minimum: Verify by examination.				
a. The name of the visitor(s)? (3a)				
b. Time and date of arrival? (3b)				
c. Time and date of departure? (3c)				
d. Reason for visit? (3d)				
e. The name of IT personnel authorizing such access? (3e)				
8. Is access to an area housing a vendor supported system for gaming and entertainment applications restricted to authorized IT personnel, or by system manufacturer's personnel when authorized by management and with periodic monitoring during each access by IT personnel or personnel independent of the department using such application? (4)				
9. Is a record of each access described in the previous standard by the system manufacturer's personnel maintained and does it include at a minimum: Verify by examination.				
a. The name of the visitor(s)? (5a)				
b. Time and date of arrival? (5b)				
c. Time and date of departure? (5c)				
d. Reason for visit? (5d)				
<u>System Parameters</u>				

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10. Are the computer systems, including gaming and entertainment related application software, logically secured through the use of passwords, biometrics, or other means approved by the Board? (6) Verify by examination.				
11. Do security parameters for passwords, if configurable, meet the following minimum requirements: Verify by examination.				
a. Are the passwords changed at least once every 90 days? (6a)				
b. Are the passwords at least 8 characters in length and do they contain a combination of at least two of the following criteria: upper case letters, lower case letters, numeric and/or special characters? (6b)				
c. Are the passwords not allowed to be re-used for a period of 18 months or within the last 10 password changes? (6c)				
d. Are user accounts locked out after 3 failed login attempts? (6d) Note 1: MICS #6 does not apply to service accounts and generic user accounts. (6, Note 2) Note 2: For MICS #6d, the system may release a locked out account after 30 minutes has elapsed. If an employee assists with releasing a locked out account and is reasonably certain of no unauthorized user access (if such information can be provided by the system and is readily available to the employee assisting in unlocking user account), the elapsed time of 30 minutes is not applicable. (6, Note 3)				
12. Relating to MICS #6d, does the written system of internal control delineate the involvement of an employee assisting in the release of a locked out account? (6, Note 3) Verify by examination.				
13. Does the written system of internal control delineate whether the system is configurable for security parameters for passwords and to what extent the system is configurable in meeting the security parameter requirements? (6, Note 1) Verify by examination.				
14. Is a system event log or series of reports/logs for operating systems (including the database and network layers where applicable) and gaming and entertainment applications, if capable of being generated by the system, configured to track the following events: Verify by examination.				

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Questions	Yes	No	N/A	Comments, W/P Reference
<p>a. Failed login attempts? (7a)</p> <p>Note: If configurable by the system, parameters may be set so that only certain attempts are flagged for review (e.g., failed login attempts exceeding a certain number or failed login attempts to a specific address are flagged for review). (Note, 7a)</p>				
<p>b. Changes to live data files occurring outside of normal program and operating system execution? (7b)</p> <p>Note: Databases and operating systems are to be configured to monitor for and record manual edits and modifications made by users (not automatically by programs or operating systems) to data files and database tables belonging to gaming and/or entertainment systems. (Note, 7b)</p>				
<p>c. Changes to operating system, database, network, and application policies and parameters? (7c)</p> <p>Note: Policies and parameters include, but are not limited to:</p> <ul style="list-style-type: none"> • Audit settings (types of events that are monitored and logged) • Password complexity settings (minimum length, maximum age, etc.) • System security levels (AS/400, QSecurity) • Point structure in players club systems. (Note, 7c) 				
<p>d. Audit trail of information changed by administrator accounts? (7d)</p>				
<p>e. Does information logged, if configurable, include the events related to the functions described in the definitions of "system administrator" and "user access administrator" and do administrator account activity logs, if provided by the system, include:</p>				
<p>i. Account login name? (7di)</p>				
<p>ii. Date and time of event? (7dii)</p>				
<p>iii. Description of event? (7diii)</p>				
<p>iv. Value before the change? (7div)</p>				
<p>v. Value after the change? (7dv)</p>				

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f. Changes to date/time on master time server? (7e)				
15. For MICS #7, does the written system of internal control delineate separately for each layer of the system (application, operating system, database and network, where applicable) whether the system is configurable, and to what extent the system is configurable, in tracking the specified events? (7, Note) Verify by examination. Verify compliance with documented procedures in the written system of internal control.				
16. Are the logs for the events listed in MICS #7(a) through (c) and (e) maintained by a licensee/operator for a minimum of seven days; and are the logs in MICS #7(d) maintained for a minimum of thirty days? (8) Verify by examination.				
17. Are the daily system event logs reviewed at least once a week (for each day of the entire previous week) by either: a) IT personnel, other than the system administrator; b) by an employee outside of the IT department, provided that the employee is independent of the department using the system for which the logs are being reviewed for events listed in MICS #7? (9 and 9, Note 2) Indicate whether "a" or "b" is used. Note: IT personnel who review the logs are independent of the system administration and user access administration functions and do not have system access to perform any administrative functions in the systems for which the logs are being reviewed. (9, Note 2)				
18. Is/(Are) the employee(s) responsible for reviewing the system event log(s) delineated in the written system of internal control? (9)				
19. Is evidence of the system event log review (e.g., log, checklist, notation on reports) either: a) maintained for a minimum of 90 days and does it include the date, time, name of the individual performing the review, the exceptions noted and any follow-up of the noted exception; or b) if an automated tool that polls the event logs for all gaming and entertainment related servers and provides the reviewer with notification of the above is used, is the notification maintained for 90 days, provided that the date, time, name of the individual performing the review of the exceptions noted, and any follow-up of the noted exception are documented in the notification or in a separate document that is maintained? (9 and 9, Note 1) Indicate whether "a" or "b" is used.				

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20. If an IT service provider maintains and administers gaming and entertainment related systems: a) is the review of the logs for events listed in MICS #7 performed by IT personnel who are employees of the licensee/operator; or b) if an automated tool is used as discussed in Note 1 for MICS #9, is the notification provided to IT personnel employed by the licensee/operator? (9, Note 3) Indicate whether "a" or "b" is used.				
21. Are exception reports (for application level only), if capable of being produced by the system, (e.g., changes to system parameters, corrections, overrides, voids, etc.) for each gaming application and entertainment tax related application maintained? (10) Verify by examination.				
22. Do the exception reports, if applicable, mentioned in the previous question include, at a minimum, the following: Verify by examination.				
a. Date and time of alteration? (10a)				
b. Identification of user that performed the alteration? (10b)				
c. Data or parameter altered? (10c)				
d. Data or parameter value prior to alteration? (10d)				
e. Data or parameter value after alteration? (10e)				
23. Does the written system of internal control indicate the system's capability of producing an exception report (includes listing of specific report[s]) and to what extent this report provides specified information? (10, Note) Verify by examination.				
<u>User Accounts</u> Note: MICS #11 through #17 in this section apply to an application level, unless otherwise specified. (Note before 11)				
24. Do management personnel, the IT service provider, or persons independent of the department being controlled, establish, or review and approve, user accounts for new employees? (11)				
25. Does provisioning for user accounts consist of assigning application functions matching the employee's current job responsibilities, unless otherwise authorized by management personnel, to ensure adequate separation of duties? (11)				

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Questions	Yes	No	N/A	Comments, W/P Reference
26. Is provisioning of user accounts for employees who transfer to a new department performed, or reviewed and approved by management personnel, or persons independent of the department being controlled? (12)				
27. For employees who transfer to a new department, is any previously assigned application function access for the employee's user account changed to inactive (disabled) prior to the employee accessing their new user account for their role or position in the new department? (12)				
28. Do user access listings include, if the system is capable of providing such information, the following at a minimum: Verify by examination.				
a. Employee name and title or position? (13a)				
b. User login name? (13b)				
c. Full list and description of application functions that each group/user account may execute? (13c) Note: The list for MICS #13c may be available in a separate report if the menu functions are easily referenced between the user access listing report and the menu function report. (13c, Note)				
d. Date and time the account was created? (13d)				
e. Date and time of last login? (13e)				
f. Date of last password change? (13f)				
g. Date and time account disabled/deactivated? (13g)				
h. Group membership of user account, if group membership is used in the system? (13h)				
29. Does the written system of internal control indicate the system's capability of producing a user access listing and to what extent the system's listing provides specified information? (13, Note 1) Verify by examination.				
Note: The user access listing is not required for entertainment tax related applications. (13, Note 2)				
30. When multiple user accounts for one employee per application are used: Verify by examination.				

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Questions	Yes	No	N/A	Comments, W/P Reference
a. Can only one user account be active (enabled) at a time if the concurrent use of the multiple accounts by the employee could create a segregation of duties deficiency resulting in noncompliance with one or more MICS? (14)				
b. Does the user account have a unique prefix/suffix to easily identify the users with multiple user accounts within one application? (14)				
31. When an employee is known to be no longer employed (e.g., voluntary or involuntary termination of employment):				
a. Is the user access administrator and/or system administrator, as applicable, notified within a reasonable period of time, established by management? (15)				
b. Upon notification, does the user access administrator and/or system administrator change the status of the employee's user account from active to inactive (disabled) status within a reasonable period of time, established by management? (15)				
c. Does the written system of internal control delineate the process and reasonable time period in notifying the user access administrator and/or system administrator and the reasonable period of time allowed for the user access administrator and/or system administrator to update the terminated employee's user account and does it address the procedures established in preventing the employee from having unauthorized access to a user terminal? (15) Verify by examination. Verify compliance with documented procedures in the written system of internal control.				
Note: For MICS #15, the reasonable period of time in notifying the user access administrator and/or system administrator and the period of time allowed for the user access administrator and/or system administrator to change the status of the terminated employee's user account assumes that it is relatively unlikely the employee will have unauthorized access to a user terminal during that time period. (15, Note)				
32. When an employee who has a user account with remote access capability is known to be no longer employed (e.g., voluntary or involuntary termination of employment):				
a. Is the user access administrator and/or system administrator, as applicable, notified as soon as possible? (16)				

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Questions	Yes	No	N/A	Comments, W/P Reference
b. Upon notification, does the user access administrator and/or system administrator change the status of an employee's user account with remote access capability from active to inactive (disabled) status? (16)				
c. Does the written system of internal control delineate the process in notifying the user access administrator and/or system administrator as soon as possible for immediately updating the terminated employee's user account with remote access capability and does it address the procedures established in preventing the employee from having unauthorized remote access? (16) Verify by examination. Verify compliance with documented procedures in the written system of internal control.				
Note: For MICS #16, during the period of time when the employee is no longer employed and until the user account has been disabled, it is assumed that it is relatively unlikely the employee will have unauthorized remote access to the system during that time period. (16, Note)				
33. Are user access listings for gaming applications at the application layer reviewed quarterly by personnel independent of the authorization and user provisioning processes? (17)				
34. Does the review mentioned in the previous question consist of examining a sample of at least 10% (with a maximum of 25) of the users included in the listing? (17)				
35. Relating to the previous question, does the reviewer maintain adequate evidence to support the review process, which includes the identified accounts reviewed, documentation of the results of the review, and e-mails or signatures and dates indicating when the user access listing was reviewed? (17)				
36. Are each of the user accounts selected pursuant to MICS #17 reviewed to determine whether:				
a. The assigned system functions are being used as authorized (i.e., system functions are appropriate for user's job position)? (17a)				
b. The assigned functions provide an adequate segregation of duties? (17b)				

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<p>c. Terminated employees user accounts have been changed to inactive (disabled) status within the time period determined by management and delineated in the written system of internal control as required by MICS #15 and MICS#16? (17c) Verify by examination.</p> <p>Note: Verification of the time period is not required if the system is not capable of providing a user access listing indicating the date and time of an account being disabled/deactivated. The written system of internal control is to delineate this reason for not performing a verification of time period. (17c, Note) Indicate if the verification is not performed for this reason and whether the written system delineates this.</p>				
<p>d. Passwords have been changed within the last 90 days? (17d)</p> <p>Note 1: The review for password changes within 90 days applies regardless of whether the system parameter has been configured to have the password changed at least once every 90 days as required by MICS #6a. (17d, Note 1)</p> <p>Note 2: MICS #17(d) does not apply when the system is not capable of providing a user access listing indicating the date of the last password change. The written system of internal control is to delineate this reason for not performing a review for password changes. (17d, Note 2) Indicate if the review for password changes within 90 days is not performed for this reason and whether the written system delineates this.</p>				
<p>e. There are no inappropriate assigned functions for group membership, if group membership is used in the system? (17e)</p> <p>Note 1: MICS 17(e) applies to a review of the assigned functions for the selected user account with group membership. (17, Note 1)</p>				

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<p>Note 1: The review required by MICS #17 does not apply to user access listings for any entertainment tax related applications. (17, Note 2)</p> <p>Note 2: The MICS #17 review applies to user access listings for computerized gaming systems with the following capabilities:</p> <ul style="list-style-type: none"> • Generates reports identifying gaming revenues; • Generates detailed records of all markers, IOU's, returned checks, hold checks, or other similar credit instruments; • Generates statistical gaming records required by the MICS; or • Generates any other records required by either the MICS or by the licensee's system of internal control. (17, Note 3) 				
<u>Generic User Accounts</u>				
37. Are generic user accounts at the operating system level, if used, configured such that either: (18)				
a. The user is automatically brought to the application logon screen immediately upon logging into the operating system, and the user is logged out of the operating system automatically upon exiting the application? (18a), or				
b. The user is only granted access to the assigned application(s) for the user's current job responsibilities, and the user is precluded from executing unassigned applications or functions from the terminal desktop and is precluded from interactive access to the operating system through the proper security configurations? (18b)				
38. Does the written system of internal control delineate the method used to secure generic accounts? (18, Note) Verify by examination. Verify compliance with documented procedures in the written system of internal control.				
39. Are generic user accounts at the application level prohibited unless user access is restricted to inquiry only functions or is specifically allowed in other sections of the MICS? (19)				
<u>Service and Default Accounts</u>				
40. If service accounts are used:				

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a. Are they utilized in a manner to prevent unauthorized and inappropriate usage to gain logical access to an application and the underlying databases and operating systems? (20)				
b. Is service account log-in and password information restricted to a limited number of authorized employees? (20)				
c. Is the employee responsible for the documentation indicating the method used to prevent unauthorized and inappropriate usage of these service accounts (available upon request by authorized internal and external auditors and by Board personnel) delineated in the written system of internal control. (20) Verify by reviewing the documentation indicating the process. Additionally, confirm compliance with documented procedures.				
Note: For MICS #20 the suggested methods to accomplish compliance include: (1) Service accounts are configured such that the account cannot be used to directly log in to the console of a server or workstation; (2) Service account passwords are to be changed at least once every 90 days, and immediately upon termination of system administrators. (20, Note)				
41. For user accounts created by default (default accounts) upon installation of any operating system, database or application:				
a. Are they configured to minimize the possibility that these accounts may be utilized to gain unauthorized access to system resources and data? (21)				
b. Is the employee responsible for the documentation indicating the procedures implemented to restrict access through the use of default accounts (available upon request by authorized internal and external auditors and by Board personnel) delineated in the written system of internal control? (21) Verify by reviewing the documentation indicating the process. Additionally, confirm compliance with documented procedures.				
42. Are any other default accounts that are not administrator, service, or guest accounts disabled unless they are necessary for proper operation of the system? (22)				
43. If the accounts mentioned in the previous question must remain enabled, are the passwords changed at least once every 90 days? (22)				

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Questions	Yes	No	N/A	Comments, W/P Reference
<u>Administrative Access</u>				
<p>Note: Administrative access means access that would allow a user to:</p> <ul style="list-style-type: none"> • Add, change, or delete user accounts and associated user provisioning for database, operating system and network layers • Modify operating system, database, and application security and policy parameters • Add, change, or delete system exception logging information • Add, change, or delete permissions to data files and folders <p>(Note before 23)</p>				
44. Is access to administer the network, operating system, applications, and database security and system parameters either:				
a. Limited to IT personnel under the supervision of supervisory and/or management employees of the licensee's/operator's IT department? (23) , or				
b. If there is no IT department, is it limited to supervisory or management personnel independent of the department using such system and/or application? (23)				
45. Daily, does an individual independent of the slot department review the requirements of a system based game and a system supported game to ensure that the administrator level access by system administrators is achieved in accordance with the requirements listed at Regulation 14, Technical Standards 1.084(4) and 1.086(4)? (24)				
<p>Note 1: MICS #24 requires a review to confirm that the system administrator level access is not achieved without the presence and participation of at least two individuals. The requirements listed at Regulation 14, Technical Standards 1.084(4) and 1.086(4) include split passwords, dual keys or any other suitable method approved by the chairman. (24, Note)</p>				
<u>Backups</u>				
46. Are daily backup and recovery procedures in place? (25)				
47. Relating to the previous question, do the procedures in place, if applicable, include:				

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<p>a. Application data? (25a)</p> <p>Note: This standard only applies if data files have been updated. (25a, Note)</p>				
<p>b. Application executable files, unless such files can be reinstalled? (25b)</p>				
<p>c. Database contents and transaction logs? (25c)</p>				
<p>48. Upon completion of the backup process, is the backup media immediately transferred to a location separate from the location housing the servers and data being backed up (for temporary and permanent storage), is the storage location secured to prevent unauthorized access and does it provide adequate protection to prevent the permanent loss of any data? (26) Verify by observation.</p> <p>Note 1: Backup data files and programs can be maintained in a secured manner in another building on the premises that is physically separated from the building where the system's hardware and software are located. They may also be stored in the same building as the hardware/software, but not in the same immediate area, as long as they are secured in a fireproof safe or some other manner that will ensure the safety of the files and programs in the event of a fire or other disaster. (26, Note 1)</p> <p>Note 2: MICS #26 does not apply to backup data files for computerized keno and bingo systems except for inter-casino linked keno games or keno games that accept multi-race keno wagers that will not be completed by the end of the next gaming day. (26, Note 2)</p>				
<p>49. Are backup system logs, if provided by the system, reviewed daily by IT personnel or individuals authorized by IT personnel to ensure that backup jobs execute correctly and on schedule and are the backup system logs maintained for the most recent 30 days? (27)</p>				
<p>50. Is the employee(s) responsible for reviewing the backup logs delineated in the written system of internal control? (27) Verify by examination. Verify compliance with documented procedures in the written system of internal control.</p>				

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<p>51. Is the employee responsible for the documentation indicating the procedures implemented for the backup processes and restoring data and application files (available upon request by authorized internal and external auditors and by Board personnel) delineated in the written system of internal control? (28) Verify by reviewing the documentation indicating the process. Additionally, confirm compliance with documented procedures.</p> <p>Note: While not mandatory, licensees are encouraged to test recovery procedures at least annually. (28, Note)</p>				
<u>Recordkeeping</u>				
<p>52. Is a list of all Board regulated systems (hardware and software) maintained which includes the system name and version identifier (indicating period of time each version was in use), related operating system and database software and hardware (including version identification and period of time each version was in use)? (29) Verify by examination.</p>				
<p>53. Is documentation for all listed in-use versions of applications, databases, network hardware, and operating systems maintained, including descriptions of both, hardware and software, operator manuals, etc.? (29) Verify by examination.</p>				
<p>54. Do system administrators maintain a current list of all enabled generic, system, and default accounts? (30) Verify by examination.</p>				
<p>55. If the operating system and/or database support more than a single gaming or entertainment application, does the list mentioned in the previous question include all system, generic or default accounts enabled on that operating system or database, regardless of the system they pertain to? (30, Note) Verify by examination.</p>				
<p>56. Does the documentation mentioned in the preceding question include, at a minimum, the following: Verify by examination.</p>				
<p>a. Name of system (i.e., the application, operating system, or database)? (30a)</p>				
<p>b. The user account login name? (30b)</p>				
<p>c. A description of the account's purpose? (30c)</p>				

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d. A record (or reference to a record) of the authorization for the account to remain enabled? (30d)				
57. Is the employee(s) responsible for maintaining the list delineated in the written system of internal control? Verify by examination. Verify compliance with documented procedures in the written system of internal control. (30)				
58. If an IT service provider is used, does the system administrator (the employee[s] delineated in the written system of internal control pursuant to Regulation 6.090) maintain an additional list of all user accounts with system administrative permission which includes at a minimum:				
a. Name of the system administered by an IT service provider? (31a)				
b. The user account(s) log-in name(s) used by an IT service provider? (31b)				
59. Are the current lists required by MICS #30 and by MICS #31 (if an IT service provider is used) reviewed by the licensee's/operator's IT management in addition to the system administrator, at least once every six months? (32)				
60. Is the list required by MICS #30 reviewed to identify any unauthorized or outdated accounts? (32)				
61. Is the list required by MICS #31 reviewed to ensure that the permissions are appropriate for each user's position? (32)				
62. Does the written system of internal control delineate the employee(s) responsible for the review? Verify by examination. Verify compliance with documented procedures in the written system of internal control. (32)				

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<p>63. Are user access listings (requirements listed in MICS #13) for all gaming systems retained for at least one day of each month for the most recent 5 years? (33) Verify by examination.</p> <p>Note 1: The lists may be archived electronically if the listing is written to unalterable media (secured to preclude alteration). (33)</p> <p>Note 2: If available, the list of users and user access for any given system is in electronic format that can be analyzed by analytical tools (i.e., spreadsheet or database) that may be employed by Board agents. (33)</p> <p>Note 3: User access listings do not need to be retained for any entertainment tax related applications. (33, Note)</p>				
<p>64. Does the IT department maintain current documentation with respect to the network topology (e.g., flowchart/diagram), deployment of servers housing applications and databases, and inventory of software and hardware deployed (available upon request by authorized internal and external auditors and by Board personnel), and is the employee responsible for maintaining the current documentation on the network topology delineated in the written system of internal control? (34) Verify by examination.</p>				
<u>Electronic Storage of Documentation</u>				
<p>65. If documents are scanned or directly stored to unalterable media (secured to preclude alteration), are the following conditions met:</p>				
<p>a. Does the storage media contain the exact duplicate of the original document? (35a)</p>				
<p>b. Are all documents stored maintained with a detailed index containing the casino department and date in accordance with Regulation 6.040(1) and is the index available upon Board request? (35b)</p>				
<p>c. Upon request by Board agents, is hardware (terminal, printer, etc.) provided in order to perform audit procedures? (35c)</p>				
<p>d. Do controls exist to ensure the accurate reproduction of records, up to and including the printing of stored documents used for audit purposes? (35d)</p>				
<p>e. At least quarterly, do accounting/audit personnel review a sample of the documents on the storage media to ensure the clarity and completeness of the stored documents? (35e)</p>				

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Questions	Yes	No	N/A	Comments, W/P Reference
66. If source documents and summary reports are stored on alterable storage media, is the media not relied upon for the performance of any audit procedures and are the original documents and summary reports retained? (36)				
<u>Creation of Wagering Instruments Database</u>				
Note: MICS #37-40 apply when creating a database of wagering instruments that will be accepted by a cashless wagering system or when creating wagering instruments within the existing cashless wagering database (creating wagering instruments to distribute to patrons for play at a slot machine). These MICS will also apply if a kiosk is used to generate promotional wagering instruments or coupons that will be accepted by a slot machine. These standards do not apply to wagering instruments that are created as a result of slot machine play. (Note before 37)				
67. Does an individual independent of the gaming area perform the database creation and, if applicable, the creation of wagering instruments to be accepted in the cashless wagering system? (37)				
68. Is a record maintained detailing the database creation and the wagering instruments to be accepted by the cashless wagering system, and does the record include evidence of user acceptance, date in service, and personnel involved? (38) Verify by examination.				
69. Monthly, is the wagering instrument database reviewed and tested by personnel of the applicable gaming area and accounting/audit personnel for any improprieties? (39)				
70. Are the procedures used and subsequent results relating to the wagering instruments database review and test documented and maintained? (40) Verify by examination.				
<u>Network Security and Data Protection</u>				
71. If guest networks are offered (such as, networks that provide internet access for patrons, hotel guests, or vendors), is adequate logical segregation provided of the guest network from the network used to serve access to gaming and entertainment tax related applications and devices? (41)				
72. Is traffic on guest networks non-routable to the network serving gaming and entertainment tax related applications and devices? (41)				

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Questions	Yes	No	N/A	Comments, W/P Reference
<p>73. Are production networks serving gaming/entertainment systems secured from outside traffic (e.g., firewall and routers) such that the systems are configured to detect and report security related events? (42)</p> <p>Note: A suggested method in complying with this standard is to configure the system to log unauthorized logins, failed login attempts, and other security related events; and block all unused ports and any in-bound connections originating from outside the network. (42, Note)</p>				
<p>74. Relating to the previous question, is the employee responsible for the documentation indicating the procedures for detecting and reporting security related events (available upon request by authorized internal and external auditors and by Board personnel) delineated in the written system of internal control? (42) Verify by examination.</p>				
<p>75. Are network shared drives containing application files and data for all Board regulated software, if used, secured such that only authorized personnel may gain access? (43)</p>				
<p>76. Are server consoles, and unattended user terminals in gaming areas, if configurable, configured to automatically secure themselves after a configurable period of inactivity elapses? (44)</p>				
<p>77. Relating to the previous question, is the amount of time determined by management documented in the written system of internal control and are users required to supply proper login credentials to regain access to the terminal or console? (44) Verify by examination.</p>				
<p>78. Are login accounts and passwords required to administer network equipment secured such that only authorized IT personnel may gain access to these devices? (45)</p>				
<p>79. Do the passwords for the accounts mentioned in the preceding question meet the security parameters of IT MICS #6, and are those accounts immediately disabled when IT personnel are terminated? (45)</p>				

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<p>Note: "Personally identifiable information" means any information about an individual maintained by a licensee including (1) any information that can be used to distinguish or trace an individual's identity, such as name, social security number, date and place of birth, mother's maiden name, or biometric records; and (2) any other information that is linked or linkable to an individual, such as medical, educational, financial, and employment information. (46, Note 1)</p>				
80. Is documentation maintained delineating the policies and procedures established to protect a patron's personally identifiable information, including, but not limited to:				
a. The designation and identification of one or more management officials having primary responsibility for the design, implementation and ongoing evaluation of such procedures and controls? (46a)				
b. The procedures to be used to determine the nature and scope of all personally identifiable information collected, the locations in which such information is stored, and the devices or media on which such information may be recorded for purposes of storage or transfer? (46b)				
c. The procedures to be used to prohibit access to a patron's unique personal identification number ("password")? (46c)				
d. The procedures to be used to reasonably ensure only a patron will be changing its password as the holder of an account? (46d)				
e. The policies to be utilized to protect personally identifiable information from unauthorized access by employees, business partners, and persons unaffiliated with the company? (46e)				
f. Notification to a patron of privacy policies? (46f)				
g. Procedures to be used in the event the operator determines that a breach of data security has occurred, including required notification to the board's enforcement division? (46g)				
h. Provision for compliance with all local, state and federal laws concerning privacy and security of personally identifiable information? (46h)				

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Questions	Yes	No	N/A	Comments, W/P Reference
81. Is the employee responsible for this documentation required by this standard delineated in the written system of internal control and is this documentation made available upon request by authorized internal and external auditors and by Board personnel. (46, Note 2) Verify by examination. Additionally, confirm compliance with documented procedures.				
<u>Remote Access</u>				
82. For each computerized gaming or entertainment tax related application that can be accessed remotely for purposes of obtaining vendor support, does the written system of internal control specifically address remote access procedures? (47) Verify by examination.				
83. Do the written procedures mentioned in the previous question include, at a minimum, the following: Verify compliance with documented procedures in the written system of internal control.				
a. The type of gaming or entertainment tax related application, vendor's name and business address (business address only for cashless wagering systems) and version number, if applicable? (47a)				
b. For a system based game and a system supported game, the method and procedures used in meeting the requirements of Regulation 14, Technical Standard 1.066? (47b)				
c. The method and procedures used in establishing and using passwords to allow authorized vendor personnel to access the system through remote access? (47c)				
d. The personnel involved and procedures performed to enable the method of establishing remote access connection to the system when the vendor requires access to the system through remote access? (47d) Indicate the personnel involved and procedures performed to enable the physical connection to the system for remote access.				
e. The personnel involved and procedures performed to ensure the method of establishing remote access connection is disabled when the remote access is not in use? (47e) Perform a physical inspection of the equipment to determine that the remote access is disabled when not in use.				

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Questions	Yes	No	N/A	Comments, W/P Reference
f. Any additional requirements relating to remote access published by the Board? (47f)				
84. In the event of remote access, is a complete record of the access prepared that includes the following: Verify by examination.				
a. Name or identifier of the licensee's/operator's employee authorizing access? (48a)				
b. Name of manufacturer/vendor? (48b)				
c. Name or identifier of manufacturer's/vendor's employee accessing system? (48c)				
d. Name of user account(s) through which the vendor's employee accessed the system? (46d)				
e. Name of the system(s) accessed by the vendor? (46e)				
f. Adequate and detailed description of work performed (including the old and new version numbers of any software that was modified)? (46f)				
g. Date, time and duration of access? (46g)				
85. Do user accounts used by vendors remain disabled on all operating systems, databases, network devices, and applications until needed by such vendor and subsequent to an authorized use by a vendor is the account returned to a disabled state? (49)				
86. Is remote access for all vendors enabled only when approved by authorized IT personnel? (50)				
87. If remote access to the production network (live network) is available, and allows access to gaming and entertainment tax related applications, is such access logged automatically by the device or software where it is established, if the system is capable of automatically logging such access? (51)				
88. If automated logging is available as described in the previous question, does the log indicate the date/time of such access and the identification of the individual/user account performing access? (51) Verify by examination.				

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89. Does the written system of internal control delineate whether automated logging is performed and the device or software performing this function? (51, Note) Verify by examination. Additionally, confirm compliance with documented procedures.				
<u>Changes to Production Environment</u>				
90. Is documentation maintained delineating a comprehensive and robust change control process to prevent any unauthorized changes being incorporated into the production environment? (52) Verify by examination.				
91. Is the employee responsible for the documentation of the change control process (available upon request by authorized internal and external auditors and by Board personnel) delineated in the written system of internal control? (52) Verify by examination.				
92. Does the documented process mentioned in the previous question include, at a minimum: Verify compliance with documented procedures in the written system of internal control.				
a. Proposed changes to the production environment are evaluated sufficiently by management personnel prior to implementation? (52a)				
b. Proposed changes are properly and sufficiently tested prior to implementation into the production environment? (52b)				
c. A strategy of reverting back to the last implementation is used (rollback plan) if the install is unsuccessful and the rollback plan is tested prior to implementation to the production environment? (52c)				
d. Sufficient documentation is maintained evidencing management approvals, testing procedures and results, rollback plans, and any issues/resolutions encountered during implementation? (52d)				
<u>Note:</u> The above process includes ALL changes to the production environment (operating system, network, databases, and applications) that relate to critical IT systems, and gaming and entertainment applications. (52, Note)				

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<u>Information Technology Department</u>				
Note: If a separate IT department is maintained or if there are in-house developed systems, MICS #53 through #56 are applicable. The IT department may consist of the licensee's/operator's IT personnel or an IT service provider. (Note before 53)				
93. Is the IT department independent of all gaming departments (e.g., cage, pit, count rooms, etc.) and operational departments subject to live entertainment tax? (53) Verify by observation.				
94. Are IT personnel precluded access to wagering instruments and gaming related forms (e.g., slot jackpot forms, table games fill/credit forms, etc.)? (54)				
<u>In-House Software Development</u>				
95. If source code for gaming and entertainment tax related software is developed or modified internally, is a process adopted to manage the development and is the employee responsible for the documentation indicating the process in managing the development or modification of source code (available upon request by authorized internal and external auditors and by Board personnel) delineated in the written system of internal control? (55) Verify by examination.				
96. Does the process mentioned in the previous question address, at a minimum, the following: Verify by reviewing the documentation indicating the process. Additionally, confirm compliance with documented procedures.				
a. That requests for new programs or program changes are reviewed by the IT supervisory personnel and the approvals to begin work on the program are documented? (55a)				
b. That a written plan of implementation for new and modified programs is maintained and includes, at a minimum: <ul style="list-style-type: none"> • The date the program is to be placed into service • The nature of the change (if applicable) • A description of the procedures required in order to bring the new or modified program into service (conversion or input of data, installation procedures, etc.) • An indication of who is to perform all such procedures? (55b)				

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c. That software development and testing procedures be sufficiently documented? (55c)				
d. Documentation of approvals, development, testing, results of testing, and implementation into production? Is the documentation maintained and does it include a record of the final program or program changes, including evidence of user acceptance, date in service, programmer, and reason for changes? (55d)				
e. Physical and logical segregation of the development and testing from the production environments? (55e)				
f. Adequate segregation of duties (i.e., those who develop/test code do not have access to introduce new or modified code into the production environment)? (55f)				
Note: For MICS #55(e) and (f) a system administrator is precluded from developing/testing code which will be introduced into the production environment. (55f, Note)				
g. Secured repositories for maintaining code history? (55g)				
h. End-user documentation (guides and manuals)? (55h)				
97. Is a copy of the associated equipment reporting form submitted to the Board pursuant to Regulation 14 for each new program or program change and a record that such software was approved for use maintained? (56)				
<u>Purchased Software Programs</u>				
Note: IT MICS #57 applies when IT personnel perform in-house modifications to a purchased software program. (Note before 57)				
98. Are new programs and program changes for purchased systems documented as follows: Verify by examination.				
a. Is documentation maintained that includes the following at a minimum: <ul style="list-style-type: none"> • The date the program was placed into service • The nature of the change (if applicable) • A description of the procedures required in order to bring the new or modified program into service (conversion or input of data, installation procedures, etc.) • An indication of who performed all such procedures? (57a)				

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b. Is a copy of the associated equipment reporting form submitted to the Board pursuant to Regulation 14 for each new program or program change and a record that such software was approved for use maintained? (57b)				
c. Is testing of new and modified programs performed (by the licensee or system manufacturer) and documented prior to full implementation? (57c)				
<u>Written System of Internal Control</u>				
99. Has the licensee's written system of internal control for information technology and information technology for each gaming department and entertainment, if applicable, been re-read prior to responding to the following question?				
100. Does the written system of internal control for information technology reflect the actual control procedures in effect for compliance with the MICS, variations from the minimum internal control standards approved pursuant to Regulation 6.090(8), and Regulation 14 associated equipment approvals? [Regulation 6.090(13)]				

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