



NEVADA GAMING CONTROL BOARD
INTERNAL AUDIT COMPLIANCE REPORTING
REQUIREMENTS

January 1, 2018

NEVADA GAMING CONTROL BOARD

INTERNAL AUDIT COMPLIANCE REPORTING REQUIREMENTS

INTRODUCTION

“Internal Audit Compliance Reporting Requirements” are internal audit programs, checklists and guidelines developed to ensure that all gaming licensees who are required to provide for an internal audit function (i.e., Group I nonrestricted licensees and operators of interactive gaming) are performing a minimum amount and similar types of internal audit compliance procedures pursuant to Regulation 6.090(15).

The Internal Audit Compliance Checklists are designed to be used in conjunction with the CPA MICS Compliance Checklists and, therefore, do not separately address compliance with the Minimum Internal Control Standards (MICS). There are internal audit checklists for all gaming revenue areas, areas subject to entertainment tax, interactive gaming and for miscellaneous regulations.

The authority for the adoption of internal audit programs, checklists and guidelines can be found in Regulation 6.090(15) effective May 22, 2003.

VERSION 8
EFFECTIVE: January 1, 2018

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Objectives

Regulation 6.090(15) requires the licensee's internal auditor to perform observations, document examinations and inquiries of employees to determine compliance with applicable statutes, regulations, and minimum internal control standards. The Board publishes checklists, programs, guidelines and example report formats for use in satisfying this regulatory requirement. The primary objective of these checklists, programs and guidelines is to provide guidance on what is necessary to comply with Regulation 6.090(15). A secondary objective is to provide some consistency among internal audit departments and other individuals performing internal audit work by standardizing the document examination sample sizes and the scope of the work to be performed. Standardized requirements ensure that all internal audit departments are performing a minimum amount of work and are performing the same required procedures. Finally, by standardizing the questionnaires and providing example report formats, the Board is able to review any internal auditor's workpapers in a more efficient and time saving manner without having to adjust to the myriad of internal audit department and accounting firm styles.

Each section contains a walk-through program and a testing program. Although the checklists are not to be considered all-encompassing, they address regulations adopted through January 1, 2018 and Minimum Internal Control Standards that became effective on January 1, 2018. As the requirements change due to the adoption of new regulations and/or statutes, internal auditors are expected to develop their own walk-through and/or testing procedures until updated versions of the checklists are distributed. Upon written notice by the Board Chairman or his designee, other procedures may be required. Additionally, these Guidelines are not intended to limit the internal auditor to the performance of only the above-specified procedures. If additional procedures are performed (e.g., expanded document testing), the results obtained should be included in the internal auditor's report pursuant to Regulation 6.090(15).

Requirement for Internal Audit Function

All nonrestricted Group I licensees, as defined in Regulation 6.010(5), are subject to these additional requirements and must provide for an internal audit function. A separate internal audit department, whose primary function is performing internal audit work and who is independent with respect to the departments subject to audit, is required to be maintained by licensees who meet either of the following criteria:

1. A single licensee having gross gaming revenue in excess of \$10 million for the 12 months ended June 30; or
2. Two or more licensees with essentially common ownership and/or management having combined gross gaming revenue in excess of \$10 million for the 12 months ended June 30.

When determining the combined gross gaming revenue, include only those nonrestricted locations classified as Group I licensees. For example, the following two licensees have essentially common ownership and management:

- (Property 1) A Group I licensee with gross gaming revenues of \$6.5 million;
- (Property 2) A Group II licensee with gross gaming revenues of \$4 million;

The licensees have combined revenues of \$10.5 million, but would not be required to maintain a separate internal audit department.

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For licensees who are not required to maintain a separate internal audit department, personnel who are independent with respect to the departments/procedures being examined perform internal audit work.

Separate Internal Audit Department

For those licensees required to maintain a separate internal audit department, this department's primary function is to perform internal audit work and is independent with respect to the departments subject to audit. Rather than using its own internal auditors, the licensee may elect to have the following individuals perform the internal audit function:

1. CPA (licensed by this state or another state or territory of the United States, who is qualified to practice public accounting in Nevada) other than the firm engaged to audit or review the licensee's financial statements pursuant to Regulation 6.080.
2. Another Individual (non-employee) - The licensee may elect to retain a non-employee individual, firm or business that does not hold a current CPA license described in #1 above.
3. Same CPA Performs Both Regulation 6.090(15) Internal Audit Procedures and Regulation 6.090(9) CPA Procedures – Pursuant to NRS 463.157, if the stock of the licensee or the stock of the licensee's parent company is publicly traded, the same CPA engaged to provide an audit, review, or compilation of the financial statements cannot also perform internal audit procedures. For other licensees, if the CPA is engaged to perform the internal audit procedures and Regulation 6.090(9) procedures, the required observations of the hard, soft and currency acceptor drop/count procedures must be separately performed to satisfy both these Internal Audit guidelines and the CPA guidelines.

When the same CPA firm performs the procedures required by both Regulation 6.090(15) and Regulation 6.090(9), the individual(s) performing the Regulation 6.090(15) procedures cannot also perform the Regulation 6.090(9) drop and count procedures.

A qualified foreign internal audit department may perform branch office internal audit work under the direction of the Nevada internal audit director (e.g., Macau internal audit department performs internal audit procedures for branch offices). The licensee may also elect to utilize the MICS compliance work of the internal audit department to substitute for the CPA work required by Regulation 6.090(9). The licensee must submit written notification to the Board, and the internal audit department must satisfy specific criteria as addressed in the CPA MICS Compliance Reporting Requirements, for such utilization to be permitted.

Qualifications of Personnel Performing Internal Function

The internal auditor (includes employees and non-employees) assigned to perform the required procedures pursuant to Regulation 6.090(15) must be independent with respect to the departments subject to audit and must have:

1. A high school diploma (or equivalent) and two years of post-secondary education which includes the successful completion of 6 courses in accounting, finance, hotel administration or in any other business-related field, or have a minimum of 6 months gaming accounting/auditing experience; or

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2. A minimum of 6 months of accounting/auditing experience with a CPA firm, or
3. If neither #1 nor #2 is satisfied, supervision of the internal auditor is provided by an auditor who meets the above requirements.

In certain limited circumstances an internal auditor may not satisfy the above criteria. For good cause, upon written request by a licensee, the Chairman or his designee may waive any of the preceding requirements.

Required Procedures

The internal auditor is required to:

1. Complete the applicable internal audit compliance walk-through procedures checklist by performing inquiries and observations during the period under review, and performing document compliance testing for dates within the period under review. An employee-completed questionnaire is not to be used to replace an in-person inquiry when performing compliance walk-through procedures. A separate checklist must be completed for each gaming revenue center, cage and credit departments, branch offices, information technology department, other miscellaneous regulations, interactive gaming operation and information technology for an interactive gaming operation. These checklists are used to determine if the licensee's procedures in effect and the documents in use comply with the MICS and applicable regulations.

Walk-through checklists must be completed once during each fiscal year in all areas, except for slots and table games, and for branch offices once every two years or five years depending on the dollar amount of deposits and credit instrument payments in the branch office. Walk-through checklists for slots and table games are completed as follows:

- *CPA MICS Compliance Checklist – All Procedures* for slots and table games is performed once during each fiscal year. Since the CPA and internal auditor will both perform a MICS compliance walk-through (*All Procedures*) during the licensee's business year, the internal auditor is not to perform these walk-throughs in the same six-month period as the CPA. This is applicable when the CPA does not utilize internal audit to substitute for CPA work.
- When the CPA utilizes internal audit to substitute for CPA work in accordance with the CPA MICS Compliance Reporting Requirements, the internal auditor may perform MICS compliance for slots (including procedures for a Mobile Gaming System) and table games as follows:
 - MICS compliance walk-through – *General Walk-through - Limited Procedures Checklist* for one six-month period; and
 - MICS compliance walk-through – *General Walk-through - All Procedures Checklist* for the other six-month period.
 - MICS compliance walk-through – *General Walk-through - All Procedures Checklist* when the licensee (a new licensee or a licensee surrendering gaming license) operates the gaming area for a partial period of greater than three months and less than twelve months.

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2. In addition to the above noted checklists, completion of the following “Other Slots Checklists” for a Mobile Gaming System are required to be performed as follows:
- Internal Audit Compliance Checklist – Slot Walk-Through Procedures (for each six-month period)
 - Internal Audit Compliance Checklist – Slots Testing Procedures (for each six-month period)
 - CPA MICS Compliance Checklist – Slots – On-Line Slot Metering Systems (for each six-month period)
 - Internal Audit Compliance Checklist – Information Technology Walk-through Procedures (once during each fiscal year)
 - Internal Audit Compliance Checklist – Information Technology Testing Procedures (once during each fiscal year)
 - CPA MICS Compliance Checklist – Information Technology MICS #1 - #60 (once during each fiscal year)

If reported annual gaming revenue for Mobile Gaming (a system based game) is less than \$5,000, the internal auditor is only required to complete the procedures pertaining to a Mobile Gaming System in the “CPA MICS Compliance Checklist – General Walk-through – Limited Procedures” and in the “Other Slots Checklists” for one of the six-month periods. The performance of all procedures for a Mobile Gaming System in the “CPA MICS Compliance Checklist – General Walk-through - All Procedures” and the performance of all procedures for a Mobile Gaming System in the “Other Slots Checklists” will be considered sufficient for the licensee’s business year for the Mobile Gaming System related procedures.

Additionally, the performance of procedures in the aforementioned IT checklists pertaining to a Mobile Gaming System are to be performed once every two years if the reported annual gaming revenue for Mobile Gaming was less than \$5,000.

If the procedures for mobile gaming are limited as allowed in the previous two paragraphs, the internal auditor is required to prepare and maintain documentation, within 15 days following the end of the business year, supporting the fact that the reported annual mobile gaming revenue was less than \$5,000 for the licensee’s business year. The internal auditor will maintain this documentation in their work papers to support not performing procedures pertaining to a Mobile Gaming System as discussed above.

3. Except as noted below, completion of the *CPA MICS Compliance Checklist – Entertainment* is performed for all areas subject to entertainment tax once during the licensee’s business year. NRS 368A.140 allows internal audit to perform procedures annually rather than every six months as indicated in NAC 368A.510(3)(b). The internal auditor is not required to complete this checklist for entertainment areas (includes special event venues) with annual live entertainment revenue of less than \$5,000. Additionally, the internal auditor may complete the *CPA MICS Compliance Checklist - Entertainment* a minimum of once every two years for entertainment venues generating annual live entertainment revenue of less than 3% of total annual reported entertainment revenue.

When the internal auditor performs less frequent reviews of certain areas subject to entertainment tax, as described in the previous paragraph, the licensee is required to prepare and maintain an entertainment revenue table at the end of the business year. The licensee is not required to prepare

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a table when the internal auditor performs entertainment MICS compliance procedures in all areas subject to entertainment tax for the year under audit. The table will indicate the name of each area subject to entertainment tax, the annual reported entertainment revenue (projected annual entertainment revenue for any area not operated for a full business year) for the entertainment area, and the percentage of the area's entertainment revenue when compared to total annual reported entertainment revenue. The internal auditor will use this table for scheduling entertainment MICS compliance procedures to be performed in the upcoming licensee's business year in determining which areas of entertainment are subject to an annual review, a review once every two years, or possibly no review. This table is maintained with the internal audit workpapers to support the frequency of entertainment MICS compliance procedures performed for areas subject to entertainment tax.

4. An unannounced observation is performed twice during each fiscal year (once during each six-month period, and not within thirty days of each other) of each of the following: Slot coin drop, slot currency acceptor drop, table games drop, slot coin count, slot currency acceptor count, and table games count. During each observation, the related key controls are reviewed by completion of the applicable CPA MICS Compliance Checklist for key controls.

The internal auditor may perform an unannounced observation of the slot coin drop and slot coin count a minimum of once a year when slot coin drop is less than 5% of the annual total combined slot coin and slot currency drop.

When the internal auditor performs an observation of a slot coin drop and count once during the licensee's business year, as described in the previous paragraph, the licensee is required to prepare and maintain a document indicating the total slot coin drop and slot currency drop at the end of the business year. The licensee is not required to maintain this document when performing the slot coin drop and count observation once every six-month period for the year under audit. The document will indicate the annual amount of drop for coin and for currency and the combined coin/currency drop total; and the percentage of the drop when comparing to total combined drop. The internal auditor will use this document for scheduling the coin drop and count observation for the upcoming licensee's business year. This document is maintained with the internal audit workpapers to support the frequency of the slot coin drop and count observations performed during the licensee's business year.

5. Use the applicable internal audit compliance testing procedures checklist and perform substantive testing of each gaming revenue center, for areas subject to entertainment tax, cage and credit departments, branch offices, information technology department, tests for compliance with gaming regulations, interactive gaming operations and information technology for interactive gaming operations. These checklists are used to determine compliance with the MICS, regulations and statutes, and to determine if the licensee's recording and reporting procedures are adequate and accurate. There is a separate audit program that covers miscellaneous compliance walk-throughs and/or testing for other regulations, as well as license conditions, compliance committees and the Internet.

Testing procedures must be completed for each six-month period of the licensee's fiscal year for the slot and table games departments, and for branch offices once every two years or five years depending on the dollar amount of deposits and credit instrument payments in the branch office. Testing procedures for all other areas need only be completed annually. Testing procedures

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includes the selection of at least one test date during each review period. Additionally, where multiple test dates are required to be selected during a year, the test dates are not to be within thirty days of each other.

The internal audit procedures required by Regulation 6.090(15) are separate from the accounting/audit procedures required by the Regulation 6.090 Minimum Internal Control Standards (MICS). At times an accounting/audit procedure required by the MICS is also a similar audit procedure required by Regulation 6.090(15). When internal audit performs similar audit procedures required by both Regulation 6.090(15) and the MICS, the individual(s) performing the MICS procedure cannot also perform the similar Regulation 6.090(15) procedure. Additionally, the internal auditor is to confirm that any accounting/audit MICS procedures, performed by an internal auditor, are being properly performed.

The above procedures are the minimum procedures that must be performed for any gaming revenue center, interactive gaming operation or for areas subject to entertainment tax being operated for more than three months during the licensee's business year. The minimum procedures are not required to be performed for any of the aforementioned areas operated for three months or less during the licensee's business year.

When performing the preceding internal audit procedures for two or more properties sharing one gaming license and a common internal control system, the multiple properties are treated as one property. The procedures may be performed on a rotating basis between the properties. For example, the internal auditor may perform compliance procedures at one property this year and then perform the same compliance procedures at the other property next year.

Photocopies of the checklists provided by the Board may be used. However, if your checklists are generated from the Board's electronic files, the format must be identical to that originally issued by the Board. A change from portrait to landscape is not considered a change in format. When modifying checklists due to regulatory changes or the addition of explanatory notes, the acceptable method will be to note the change following the question/procedure (which remains worded as issued by the Board). Although copies of the checklists are expected, the Board may grant approval for other formats.

Do not use checklists for areas that are inapplicable to your operation. For example, if you do not offer keno, discard the keno checklists; do not mount unnecessary checklists in your workpapers and mark them "not applicable".

Upon written request by a licensee, the Audit Division may provide written approval to waive the performance of internal audit procedures in one or more areas of review for a specific year due to the occurrence of unusual circumstances, for good reason, or to extend report submission deadlines. The Board will consider waiving, on a case by case basis, specific internal audit compliance procedures where automated controls are determined to be in place and functioning effectively. Such approval is at the sole discretion of the Board. For new licensees, or for licensees that have surrendered their gaming license that were in operation for three months or less by the end of their business year, performance of these internal audit procedures is not required for the partial period. The Board classifies new licensees as Group I based on their first-year gross gaming revenue projections. Such initial classification should be used when determining whether recently licensed entities are required to maintain a separate internal audit department and/or comply with Regulation 6.090(15).

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Performance and Completion

The internal auditor must perform and complete procedures in accordance with the following requirements:

1. All questions on each applicable checklist must be completed. Detailed explanations must be provided for all “no” and “N/A” responses and for exceptions noted during document testing.
2. Observations must be performed on an unannounced basis and, whenever possible, are to be performed without the employees being aware that their activities are being observed. For purposes of these procedures, “unannounced” means that no officers, directors, or employees are given advance information regarding the specific dates or times of such observations. Such observations may be performed from the surveillance room if practical. If advance arrangements for count room access are necessary between the licensee and the internal auditor, the arrangements indicating the method that will be used to allow the internal auditor access to the licensee’s count rooms should be made no later than 90 days after the start of the licensee’s business year. Documentation should be prepared by the internal auditor indicating the date the arrangements were made, the time period the arrangement is in effect, procedures to allow the internal auditor prompt access to the licensee’s count room and the method to ensure proper identification of the internal auditor. These arrangements should allow the internal auditor prompt access to the count rooms at any time without prior notification to any licensee personnel. Any subsequent updates to these arrangements (e.g., personnel updates) should be made on a regular basis (e.g., quarterly) to avoid alerting the gaming operation of an upcoming observation.

If the drop teams are unaware of the internal audit drop observations and therefore the count observations would be unannounced, the hard count and soft count rooms may be entered simultaneously. Additionally, if the slot currency acceptor count begins immediately after the table games count in the same count room, by the same count team, and using the same equipment, the currency acceptor count observation can be conducted on the same day as the table games count observation as long as the internal auditor remains until monies are transferred to the vault/cage and accepted into accountability. When these conditions do not exist, counts must be observed on separate days.

Observations may be performed live using surveillance equipment. However, because the internal auditor must observe the count until the monies are transferred to the vault/cage and accepted into the vault/cage accountability, any change in viewing location (i.e., from the count room to the surveillance room) will necessitate reviewing the surveillance tapes for the time period during which the auditor was in transit.

3. The licensee’s written system of internal control (the “System”) must be compared by the internal auditor to the procedures being used in the licensee’s casino operations. Regulation 6.090(13) requires the licensee to comply with its written system of internal control as it relates to compliance with the Minimum Internal Control Standards, variations from the Minimum Internal Control Standards approved pursuant to Regulation 6.090(8), and Regulation 14 associated equipment approvals. Accordingly, in completing the final procedures of the “CPA MICS Compliance Checklists”, the internal auditor must compare the written system of internal control against actual control procedures in effect as they relate to compliance with the MICS, MICS variations, and associated equipment approvals.

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4. The internal auditor performs compliance testing of various documents referred to in the CPA MICS Compliance Checklists and the Internal Audit Compliance Testing Procedures Checklists to determine compliance with the MICS, regulations, and statutes and to determine if the licensee's recording and reporting procedures are adequate and accurate. The scope of such testing is indicated on the checklist where applicable. When multiple test dates are required to be selected, the test dates must not be within thirty days of each other. The checklists and/or back-up workpapers must include documentation of the original document examined by either explicitly identifying the form(s) (e.g., document # of slot jackpot form) examined or including a copy of the document(s) examined.

Note: An original document is the document maintained pursuant to Regulation 6.060 which may be an original document scanned or directly stored to unalterable media (secured to preclude alteration) as approved by the Board.

5. All exceptions resulting from internal audit work are investigated and resolved with the results of such being documented and retained for five years. Documentation should include the names of individuals and job titles with whom inquiries were made and how the investigation was conducted.
6. The results of internal audit work should be reported directly to the audit committee, if applicable, and to senior management/ownership personnel who are independent of the departments under review. Internal audit findings are properly communicated to the appropriate employees of the gaming operation. The results of internal audit work will not include the findings of any accounting/audit procedures performed by internal auditors, which are required to be performed by Regulation 6.090 Minimum Internal Control Standards.
7. When two or more persons perform the internal audit function as required by 6.090(15), a supervisory review is performed of the internal audit work by someone other than the individual performing the procedures being reviewed. The individual performing the review of the internal audit workpapers will initial or sign on the workpaper. For electronic internal audit workpapers, an electronic signature and date along with an audit certification page may be maintained evidencing a review of the electronic workpapers.
8. Follow-up inquiries, observations, and examinations are performed to verify that corrective action has been taken regarding all instances of noncompliance cited by internal audit, the Gaming Control Board and/or the independent accountant with the results of such being documented. The verification is performed within six months following the date such notification was transmitted to management. For branch office noncompliance, the verification is performed within one year following the date transmitted to management.

Report Submission Requirements

Two copies of the internal auditor's report identifying procedures required by the Board and any additional gaming-related compliance audit procedures not required by the Board (i.e., management request, Sarbanes-Oxley procedures), a reference to the applicable internal audit checklists completed, all instances of noncompliance noted (regardless of materiality), the review period, and senior management/ownership personnel responses to the noted noncompliance must be submitted to the Board. The testing procedures

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results for the test date(s) selected during the licensee's fiscal year must be included in the internal auditor's report by at least the second-half of the business year's report. However, it is encouraged that testing results for test dates selected during the first-half of the year are included in the internal auditor's report for the first six-month period of the licensee's fiscal year. Additionally, regarding noted noncompliance, the report must describe all instances of procedural noncompliance (regardless of materiality) with the regulations, MICS or approved variations, and all instances where the licensee's written system does not adequately reflect the licensee's actual control procedures in effect as they relate to compliance with the MICS, MICS variations, and associated equipment approvals.

The internal auditor's first-half of the business year report is to be submitted to the Board within 120 days after the end of the first six months of the licensee's business year. The internal auditor's second-half of the business year report is to be submitted to the Board within 150 days after the end of the business year and separate from the CPA's Regulation 6.090(9) compliance report even though Regulation 6.090(15) and NAC 368A.510(3)(c) both allow the second-half internal audit report to be included in the CPA's Regulation 6.090(9) compliance report. All workpapers and reports must be completed and reviewed prior to the 120-day and 150-day deadline to submit such reports, so that workpapers supporting these reports will be complete and readily available for Board review immediately following the reporting deadlines.

Effective July 1, 2012, one hard copy report and one electronic copy report is to be submitted to the Board. Instructions for submitting these reports can be found on the Board's website at <http://gaming.nv.gov>.

For each instance of noncompliance noted in the internal audit compliance reports, the following information must be included:

1. The citation of the applicable Nevada Revised Statute, Nevada Gaming Commission and Nevada Gaming Control Board Regulation, or Minimum Internal Control Standard for which the instance of noncompliance was noted.
2. A narrative description of the noncompliance, including the number of exceptions and sample size tested.
3. Management's responses to the noted instances of noncompliance.
4. Instances of noncompliance determined to be immaterial may be disclosed as a separate section of the report. A table may be prepared indicating the type of audit (i.e., slots, keno, credit, etc.), MICS #, noted exception and reason noted exception is determined to be immaterial. A broad management response is acceptable for acknowledging the instances of all immaterial noncompliance.
5. Instances in which the written system of internal control does not reflect the actual control procedures in effect as they relate to compliance with the MICS, MICS variations, and associated equipment approvals.

Refer to the Example Report Formats section of this document for example reports that may be used, which will contain all of the information discussed above, for summarizing findings.

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All completed checklists and supplemental workpapers must be retained for five years. The completed checklists should not be forwarded as a part of the report submitted to the Board.

Please contact the Board's Audit Division in Reno or Las Vegas if you require clarification of the preceding guidelines.

Example Report Formats

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INTERNAL AUDIT REGULATION 6.090(15) REPORT FORMAT

EXAMPLE A - PREPARED BY LICENSEE'S INTERNAL AUDITOR (IN-HOUSE INTERNAL AUDITOR OR OTHER INDIVIDUAL WHO IS NOT A CPA)

We have performed the procedures enumerated below, which are required by Regulation 6.090(15) of the Nevada Gaming Commission and Nevada Gaming Control Board in evaluating [name of licensee]'s compliance with the applicable statutes, regulations, and minimum internal control standards during the six-month period ended [date].

The procedures that we performed and our findings are as follows:

1. In accordance with the "Internal Audit Compliance Reporting Requirements" effective January 1, 20XX, we completed the following: [List of "Internal Audit Compliance Checklists" completed]

We noted instances of noncompliance that have been included in _____ to this report [or "list findings here"] [or we noted no instances of noncompliance]. **(Refer to the "REQUIREMENTS FOR SUMMARIZING FINDINGS")**

2. [If applicable, list additional procedures performed at the request of the Audit Committee, if applicable, Senior Management/Owners of the Licensee or the Nevada Gaming Control Board.]

We noted instances of noncompliance that have been included in _____ to this report [or "list findings here"] [or we noted no instances of noncompliance].

[Signature]

[Date]

INTERNAL AUDIT REGULATION 6.090(15) REPORT FORMAT

EXAMPLE B - PREPARED BY LICENSEE'S INTERNAL AUDITOR (CPA FIRM)

Independent Accountants' Report On Applying Agreed-Upon Procedures

To the Audit Committee (if applicable) and Senior Management/Owners of ABC Company:

We have performed the procedures enumerated below, which are required by Regulation 6.090(15) of the Nevada Gaming Commission and Nevada Gaming Control Board (collectively the "Regulators"). These agreed-upon procedures are intended solely to assist ABC Company's management and the Regulators in evaluating ABC Company's compliance with the applicable statutes, regulations, and minimum internal control standards during the six-month period ended [date]. ABC's Company's management is responsible for ABC Company's compliance with the applicable statutes, regulations, and minimum internal control standards and published guidelines issued by the Regulators.

This agreed-upon procedures engagement was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. The sufficiency of these procedures is solely the responsibility of those parties specified in the report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

The procedures that we performed and our findings are as follows:

1. In accordance with the "Internal Audit Compliance Reporting Requirements" effective January 1, 20XX, we completed the following: [List of "Internal Audit Compliance Checklists" completed]

We noted instances of noncompliance that have been included in _____ to this report [or "list findings here"] [or we noted no instances of noncompliance]. **(Refer to the "REQUIREMENTS FOR SUMMARIZING FINDINGS")**

2. [If applicable, list additional procedures performed at the request of the Audit Committee, if applicable, Senior Management/Owners of the Licensee or the Nevada Gaming Control Board.]

We noted instances of noncompliance that have been included in _____ to this report [or "list findings here"] [or we noted no instances of noncompliance].

We were not engaged to, and did not conduct an examination, the objective of which would be the expression of an opinion on management's compliance with the applicable statutes, regulations, and minimum internal control standards and published guidelines issued by the Regulators. Accordingly, we do not express such an opinion. Had we been engaged to perform additional procedures, other matters might have come to our attention that would have been reported to you.

This report is intended solely for the use of the Audit Committee (if applicable) and Senior Management/Owners of ABC Company and the Regulators and is not intended to be and should not be used by those who have not agreed to the procedures and taken responsibility for the sufficiency of the procedures for their purposes.

[Signature]

[Date]

EXAMPLE FINDINGS REPORT

Fun Time Casino

Instances of Noncompliance Reported to Management by Internal Audit for the Six-Month Period Ended [Date]

Slots

Slot MICS #48 states: Drop boxes, when empty, are shown to another member of the count team, to another person who is observing the count, or to recorded or live surveillance, provided the count is monitored in its entirety by someone independent of the count.

During the observation of the currency acceptor count process at Fun Time Casino on September X, 20XX, we noted that on two occasions, one count team member showed the box to another count team member but did not receive acknowledgement that the box was empty. Additionally, inside of the box was not clearly visible to the surveillance cameras.

Management Response: All count personnel have been reminded via a memorandum dated January X, 20XX, that it is required to have another team member visually verify the currency acceptor drop box is empty. Additionally, the soft count team members have been instructed to be very deliberate when showing the empty box and to clearly acknowledge that the box has been completely emptied.

Table Games

Table Games MICS #13 states: The issue slip includes the same marker number as the original, the table number, date and time of issuance, and amount of credit issued. The issue slip also includes the signature of the individual issuing the credit, and the signature or initials of the dealer at the applicable table, unless this information is included on another document.

During our detail testing, an examination of an issue slip (number XXXX) prepared on December X, 20XX, revealed that there was no time of issuance indicated on the slip.

This exception appears to be isolated. Thirty slips were reviewed for five test dates (10/16/XX, 10/23/XX, 11/07/XX, 11/29/XX and 12/5/XX) and only 1 out of the 30 slips prepared on December X, 20XX, did not indicate the time of issuance.

Management Response: All table games personnel have been reminded via memorandum dated January X, 20XX, that the marker issue slip must include the date and time of issuance.

Keno

No exceptions were noted.

Cage and Credit

Cage and Credit MICS #73 states: An individual independent of the cage, credit, and collection functions performs the following review procedures at least three times per year:

- a. Select a sample of credit accounts and ascertain compliance with credit limits and other established credit issuance procedures pursuant to Cage and Credit MICS #1 and Regulation 6.120(2).

A discussion with the accounting supervisor on September X, 20XX, disclosed that the aforementioned procedure has not been performed during the year 20XX. This is a recurring violation noted in the internal audit report for the period ended June 30, 20XX.

Management Response: The accounting supervisor has completed this procedure for the year ended December 31, 20XX, as of January X, 20XX. The controller has reviewed the procedures performed to ensure the procedures were properly performed.

Miscellaneous Regulations

Regulation 3.100 Employee Report

Regulation 3.100 requires that the licensee submit a semi-annual report identifying every individual who is actively engaged in the administration or supervision of the operation as described by the regulation.

A discussion with the controller on September X, 20XX, disclosed that a semi-annual report was inadvertently not submitted for the period January 1, 20XX through June 30, 20XX.

Management Response: The controller has submitted a Regulation 3.100 employee report for the period January 1, 20XX through June 30, 20XX to the Board on December X, 20XX.

REQUIREMENTS FOR SUMMARIZING FINDINGS

1. A separate report is prepared for each licensee. The report is to include the date submitted to the licensee.
2. Subdivide the findings/exception portion of the letter by type of audit (i.e., slots, keno, credit, etc.). Under each audit section list the exceptions noted from that audit. If no exceptions are noted, indicate this under the applicable audit heading. There should be an audit heading for each audit performed during the period covered by the letter, whether or not exceptions are noted.
3. Clearly state the basis for the exception (i.e., MICS # or regulation citation). Do **not** indicate the checklist procedure number as the basis for the exception. For exceptions noted for testing procedures performed without a MICS or regulation citation, indicate the specific procedure performed (not procedure number).
4. Indicate how the exception was discovered (i.e., interview with employee on (MM/DD/YY), observation on (MM/DD/YY), detail testing on (MM/DD/YY), etc.)
5. If the exception was discovered through observations of an employee performing his or her duties, indicate if the exception appears to be isolated or whether it is part of the employee's routine procedures.
6. If the exception was discovered through detail testing, indicate the sample size examined (i.e., number of days reviewed, number of forms reviewed, etc.) and the time period from which the sample was selected (i.e., second half of 20XX).
7. After each exception indicate the applicable management response and date of management's response. The management's response can be on a separate document as long as it is clearly referenced to the applicable exception. Each exception must be accompanied by a separate response. It is not acceptable to provide one management response addressing multiple exceptions, unless determined to be an immaterial exception as addressed in #11. This response should indicate specifically what procedures management has taken to correct the problem and the date such changes became effective.
8. If Internal Audit or the CPA previously cited the same exception within the current reporting period, a reference should be made to the date of the audit in which the exception was originally noted and whether Internal Audit or the CPA discovered it. The reasons for the repeated noncompliance should also be noted (i.e., management implemented change but employees subsequently reverted to incorrect procedures, etc.).
9. If Internal Audit or the CPA notes the same exception as the licensee's accounting/audit personnel through the normal course of their work, this exception is still documented and noted in the report. The internal audit or CPA workpapers and the report submitted to the Board indicate the corrective actions taken by the licensee when first notified by the licensee's accounting/audit personnel.
10. The exceptions noted (or lack of exceptions) may be in table form as long as the table contains all necessary information in the format indicated above.

11. Instances of noncompliance determined to be immaterial may be disclosed as a separate section of the report. A table may be prepared indicating the type of audit (i.e., slots, keno, credit, etc.), MICS # or regulation cite, noted exception and reason noted exception is determined to be immaterial. A broad management response is acceptable for acknowledging the instances of all immaterial noncompliance.

Checklists