STATE OF NEVADA
GAMING CONTROL BOARD
INTERNAL CONTROL PROCEDURES

SLOTS

Note 1: For any board-authorized computer applications, pursuant to Regulation 14, alternate documentation and/or controls that provide at least the level of control described by these procedures will be acceptable.

Note 2: One slot route operator's employee may be used to fill the employee requirements except in a supervisory capacity.

Note 3: The controls in effect for participation machines will provide at least the level of control described by these procedures.

Jackpot Payouts, Short Pays, Cancelled Credit Payouts, Promotional Payouts and Slot Fills

Note: Promotional payouts are supplemental payouts that are not reflected in the slot machine paytable. Promotional payout forms are only required for payouts that are deducted from gross gaming revenue.

1. Jackpot payout tickets, including short pays and payouts of cancelled credits, promotional payout forms, and fill slips are multi-part forms that include the following information:
   a. Date.
   b. Time.
   c. Machine number.
   d. Game outcome (e.g., reel symbols, card values, suits, etc.) for jackpot payout or reason for promotional payout (e.g., double jackpots, four-of-a-kind bonus).
   e. Dollar amount of the payout or slot fill (both alpha and numeric), or description of personal property awarded (e.g., jacket, toaster, car).
      Note: Alpha is optional if another unalterable method is used for evidencing the amount of the payout or fill.
   f. Signatures of at least two employees verifying, authorizing, completing and witnessing the payout or slot fill.
   g. The type of payout (e.g., slot machine jackpot, fill, cancelled credits, short pay, promotional payout, external bonus, and external progressive).
   h. Preprinted or concurrently printed sequential numbers.

2. For payouts of $10 or less, a single part payout form is acceptable and only requires the signature of one employee verifying and completing the payout.

3. Promotional payouts of $500 or more that are not deducted from gross gaming revenue are documented on a payout form that includes the following information:
   a. Date.
   b. Time.
   c. Machine Number.
   d. Dollar amount of payout or description of personal property (e.g., jacket, toaster, car).
   e. Reason for payout (e.g., double jackpots, four-of-a-kind bonus).
   f. Signature of two employees verifying, authorizing, completing and witnessing the promotional payout.
4. When a sequentially-numbered payout form is voided, the following steps are performed:
   a. Preparer clearly marks “VOID” across the face of all non-restricted copies of the form.
   b. Preparer and another employee sign across the face of all non-restricted copies of the form.
   c. All copies of the form are submitted to the accounting department for retention and accountability.

5. Payouts in excess of $10 are controlled and completed in a manner that precludes any one individual from initiating and producing a fraudulent payout form, obtaining the funds, forging signatures on the payout form, routing all parts of the payout form and misappropriating the funds, or that precludes a custodian of funds from altering the dollar amount on all parts of the payout form subsequent to the payout and misappropriating the funds.

Note: Acceptable procedures in meeting the requirements of this standard include, but are not limited to, the following:
   a. Funds are issued to the employee who will verify the payout (i.e., someone other than the individual who generated/requested the ticket) or to two individuals concurrently (i.e., the generator/requestor of the form and the verifier of the payout). Both individuals witness the payout, or
   b. The routing of one part of the completed form is under the physical control (e.g., dropped in a locked box) of an individual other than the individual that obtained/issued the funds and the individual that obtained/issued the funds must not be able to place the form in the locked box.

Payment on Wagering Instruments

6. Prior to making payment on a wagering instrument, an employee must verify the validity of the instrument through the cashless wagering system.

Note: An employee cannot verify the validity of the wagering instrument by inserting it into a slot machine bill validator.

7. In the event of system failure, supervisory personnel must approve payment of all wagering instruments in excess of $100 by initialing the wagering instrument. For these payouts, supervisory personnel review the transaction history from the slot machine or any other similar method to verify the validity of the wagering instrument.

8. Wagering instruments paid during a period of system failure are written/stamped with a paid designation, initialed by the cashier and noted with the date paid. The wagering instruments paid without system validation must be entered into the cashless wagering system when the system resumes operation.
9. Payment of lost, stolen, mutilated or expired wagering instruments of $50 or more that cannot be validated by the cashless wagering system are approved by supervisory personnel by initialing the wagering instrument, if provided by a patron. Supervisory personnel review the applicable slot machine’s transaction history or other cashless wagering system records to verify the validity of the wagering instrument. The payment of the wagering instrument is entered into the cashless wagering system at the time the instrument is paid.

10. Unredeemed wagering instruments can only be voided in the cashless wagering system by personnel independent of the slot department. The employee completing the void clearly marks “void” across the face of the form and signs across the face of the form. The accounting department maintains the voided wagering instrument.

11. At least weekly:
   a. Wagering instruments and payout receipts redeemed at a wagering instrument redemption machine are removed by at least two employees.
   b. At least two employees reconcile the cash remaining in each wagering instrument redemption machine to the beginning cash placed in the machine less the wagering instruments and payout receipts redeemed.
   c. Wagering instruments and payout receipts are ultimately delivered to the accounting department.

**Payout Receipt Systems**

Note: A payout receipt system issues a receipt/report for cancelled credits that may not be re-wagered and therefore is not a cashless wagering system. Some systems print a receipt only at the slot machine, while others only print a report at a printer station that is located within a cashier’s area (including cage, booth, change banks, etc.).

12. Prior to making a payment on a payout receipt, the cashier must verify the validity of the payout through the payout receipt system.

13. For systems that generate payout receipts at the slot machine, in the event of system failure, supervisory personnel must approve payment of all payout receipts in excess of $100 by initialing the payout receipt.

14. For systems that generate payout receipts at the slot machine, payout receipts paid during a period of system failure without system validation must be entered into the payout receipt system when the system resumes operation.

15. For systems that generate payout receipts at the slot machine, the payout receipt is exchanged for funds and then placed in the cashier’s bank for shift-end reconciliation purposes.
16. For systems that generate a report at a printer station in a cashier’s area:
   a. The report is used for shift-end reconciliation procedures.
   b. If the report does not uniquely identify the cashier performing the reconciliation, the cashier must sign the report.
   c. If the employee(s) supervising the games cannot visually verify the specific patron playing a slot machine (either physically or through electronic surveillance), any automatic or remote controlled reset device for those games must be disabled. Any jackpot payout or credit cash out required for that machine must be physically verified by an employee at the machine.

**Slot Drop Procedures**

Note: Throughout these slot procedures the term “wagering instrument” refers to slot machine wagering vouchers and slot machine coupons, terms defined in NGC regulations. The currency acceptor drop and count procedures also apply to wagering instruments.

17. The currency acceptor and coin drop and count for each slot machine must be performed at least monthly.

18. The slot drop is performed by a minimum of two employees.

19. To ensure funds are not removed during the slot drop, a second employee must be able to monitor (witness) at all times the removal and placement of the currency acceptor drop boxes and/or coin from the slot machine onto the drop cart.

20. Security is provided over the drop cart contents until they have been transported to the count room.

21. If more than one trip is required to remove the currency acceptor drop boxes and/or coin from the slot machines, the filled drop carts or contents thereof are either locked in the count room or secured in another equivalent manner.

22. The slot drop proceeds are secured until counted, with access to the stored drop carts or contents thereof restricted to authorized members of the drop and count teams.

**Equipment Control**

23. The calibration module of the weigh scale (if used) is secured at all times by a seal of such a nature to prevent tampering (e.g., pre-numbered labels, lock and key, etc.).

24. The licensee, licensed key employee, or another employee designated by management and independent of the count is notified and present at any time the calibration module is accessed. Such access is documented and maintained.

Note: This procedure is not applicable to slot route operators.
25. If a currency counter and/or weigh scale interface is used, it is adequately restricted so as to prevent unauthorized access (e.g., passwords, keys, etc.).

26. If the weigh scale has a "zero adjustment mechanism," it is either physically limited to minor adjustments (e.g., weight of a bucket) or physically situated such that any unnecessary adjustments to it during the weigh process would be observed by other count team members.

27. On at least a quarterly basis, unannounced tests of the following equipment are performed independent of the normal count process by someone independent of the count team, and the results of such tests by denomination are documented and maintained:
   a. Currency counter and currency counter interface (if applicable) tests including all denominations of currency and all types of wagering instruments counted by the currency counter.
   b. Weigh scale, weigh scale interface (if applicable), and/or coin counter tests including all denominations of coin and tokens accepted by the slot machines.

General Count Procedures

28. The slot count and wrap process is performed by a minimum of two employees. At no time during the count or wrap process will there be fewer than two employees in the count room.

29. Access to the count room during a count is restricted to members of the drop and count teams, authorized observers, supervisors for resolution of problems, and authorized maintenance personnel.

30. All coin, tokens, chips and/or cash inventory stored in the count room is secured from unauthorized access at all times during the drop and count process.

31. Transfers of coins, tokens, wagering vouchers, coupons or currency in or out of the count room are strictly prohibited until all count and verification procedures are complete.

32. Corrections on any count documentation are made by crossing out the error, entering the correct figure, and then obtaining the initials of at least two count team members who verified the change. If an interface is used, corrections to count data are made by crossing out the error on the document, entering the correct figure, and then obtaining the initials of at least two count team members who verified the change. If this procedure is used, an employee independent of the count team enters the correct figure into the computer system prior to the generation of related slot reports.
33. An employee who does not accept accountability of the drop proceeds transports all count and wrap documentation, including wagering instruments, to the accounting department immediately after the verifier signs it. Alternatively, it may be adequately secured (e.g., locked container to which only accounting personnel can gain access) until retrieved by the accounting department.

Note: A copy of the count sheet that is faxed to another location (e.g., corporate office) by the independent verifier will be considered acceptable if the faxed copy is compared/reconciled to the original drop paperwork and the casino accountability or bank deposit.

Coin Count Procedures

34. Immediately prior to the coin count a count team member tests the weigh scale/metered count machine with a substantial amount of varying weights or with a significant number of previously counted coin before each denomination is weighed/counted to insure the scale is properly calibrated or the metering device is functioning properly. The test results are recorded on the slot count documentation and signed by at least two count team members performing the test.

35. The amount of the coin drop from each machine and in total for each denomination is recorded in ink on a slot count document or it is mechanically printed by the weigh scale. If a weigh scale interface is used, the coin drop figures are transferred via direct line or computer storage media. If applicable, the weigh/metered count will be converted to dollar amounts on a slot count document.

36. The coins are wrapped immediately after being weighed/metered.

Note: The term "wrapped coin" includes wrapped, bagged and racked coin/tokens.

37. Bagged coin, if applicable, must be meter counted. Each bag is sealed and labeled with the dollar amount contained in the bag.

38. If the coins are transported off the property, a wrapped count procedure must be performed before the coins leave the property, and any variances documented.

39. As the coin is being wrapped, it is maintained in such a manner so as to be able to obtain an accurate count when the wrap is completed.

40. Upon completion of the wrap of the coin drop, the final count figures, by denomination and it total, are recorded on a summary report. Prior to verification of the count by the independent verifier, the count team compares the final wrap to the weigh/count in total and by denomination, recording the comparison and noting any variances in the summary report.

41. An employee who is independent of the count team performs an independent count of the wrapped coin drop by denomination and reconciles it to the coin drop amount recorded on the summary report. Any variance is reconciled and documented.
42. At the conclusion of the reconciliation, the verifying employee who assumes accountability of
the coin drop proceeds sign the summary report(s), or other reconciling document, attesting to
its accuracy.

43. The wrapped coins are transported to the cage, vault or other area of accountability
immediately after the reconciliation of the weigh/count to the wrap.

44. Variations between the weigh/meter count and wrap, in excess of $10 or 1% (whichever is
greater) for any denomination, are investigated immediately and explained on the summary
report.

45. Immediately after the completion of the wrap, all employees participating in the wrap process
sign the summary report to attest to their presence, the accuracy of the amount recorded
and/or the procedures performed.

Currency Acceptor Count Procedures

46. The count team does not have access to bill-in amounts per the slot machine meters until after
the count is completed and the drop proceeds are accepted into the cage, vault or other area of
accountability.

47. Immediately prior to the currency acceptor count at least two count team members verify the
accuracy of the currency counter with previously counted currency for each denomination and
with each type of wagering instrument counted by the currency counter to ensure the counter is
functioning properly. The test results are recorded on the slot count documentation and signed
by at least two count team members performing the test.

Note: If the same count team members complete a count for one revenue center and then
immediately complete a count for a second revenue center, the currency counter test
would only need to be completed at the beginning of the first count.

48. The currency acceptor drop boxes are individually emptied and counted in such a manner as to
prevent the commingling of contents between boxes before the box contents have been
counted and recorded.

49. Drop boxes, when empty/emptied, are shown to another member of the count team or to
recorded or live surveillance, provided the count is monitored in its entirety by someone
independent of the count.

50. The dollar amount of the currency drop from each machine and in total for each denomination
of slot machine on the floor is recorded in ink or other permanent form of recordation on a slot
count document. If a currency counter interface is used, the currency drop figures are
transferred via direct line or computer storage media.

51. The dollar amount of wagering instruments removed from each drop box is recorded, by
machine, in the cashless wagering system. The cashless wagering system will generate a slot
count document indicating the wagering instruments counted by machine and in total.
52. At the conclusion of the count, the currency drop amount recorded on the count sheet is reconciled to the currency drop in the count room by a count team member who does not function as the sole recorder, with variances reconciled and documented.

Note: This standard does not apply to wagering instruments removed from the currency acceptor drop boxes.

53. After the count sheet has been reconciled to the currency, all employees participating in the count process sign the summary report to attest to their presence, the accuracy of the amount recorded and/or the procedures performed.

54. An employee who is independent of the count team performs an independent count of the currency drop proceeds and reconciles it to the currency drop amount recorded on the count sheet. Any variance is reconciled and documented.

Note: This standard does not apply to wagering instruments removed from the currency acceptor drop boxes.

55. The employee verifying the proceeds certifies by signature as to the accuracy of the count and assumes accountability of the currency drop proceeds or secures the drop paperwork.

Slot Key Control

56. The slot machine coin drop cabinet keys, slot machine door keys, currency acceptor drop box contents keys and currency acceptor drop box release keys are all separately keyed from each other.

57. During the slot drop procedure, only the employees authorized to drop the currency acceptor drop boxes are allowed access to the currency drop box release keys. These same employees are precluded from having access to currency acceptor drop box contents keys and currency acceptor drop box release keys simultaneously.

58. Access to the slot machine coin drop cabinet keys, currency acceptor drop box release keys, currency acceptor drop box contents keys, and all duplicates requires the physical involvement of at least two employees. A report is maintained indicating the date, time, machine number, reason for access, and signature or electronic signature of employees signing out/in the keys. Two employees are required to accompany the keys from the time of its issuance until the time of its return.

Note: “Electronic signature” includes a unique employee PIN or card, or employee biometric identification validated and recorded through a computerized system.

59. Records are maintained for each duplicate key, as addressed in this section, which indicate the number of keys made and destroyed.
60. Computerized key security systems which restrict access to the slot drop and count keys through the use of passwords, keys or other means, other than a key custodian, must provide the same degree of control as indicated in the aforementioned key control procedures.

Note: This procedure does not apply to the system administrator. The system administrator is defined in ICP #61a.

61. For computerized key security systems, the following additional slot key control procedures apply:

   a. Management personnel assign and control user access to keys in the computerized key security system (i.e., system administrator) to ensure that slot drop and count keys are restricted to authorized employees.
   
   b. Access to the emergency manual key(s) (a.k.a. override key), used to access the box containing the slot drop and count keys, requires the physical involvement of at least two employees. The date, time, and reason for access must be documented with the signatures of all participating employees signing out/in the emergency manual key(s).
   
   c. The custody of the keys issued pursuant to “b.” above, requires the presence of two employees from the time of their issuance until the time of their return.

Slot Wagering Account Transfers

Note: A wagering account transfer is a transfer of funds between an established patron’s wagering account and a slot machine.

62. In order to facilitate the reconciliation required by ICP #70b, slot wagering accounts must be established at one area of accountability (e.g., main casino cage). Further, all subsequent deposits/withdrawals and account adjustments must be transacted at the same area of accountability.

63. For each wagering account established, an employee shall:

   a. Require the patron to personally appear at the licensee’s premises.
   
   b. Examine in the patron’s presence, the patron’s valid driver’s license or other reliable identity credential.
   
   c. Record:
      1) The patron’s name or other unique identifier of the patron, if requested by the patron.
      2) Type of identification credential, credential number, expiration date of credential, and date credential was examined.
      
      Note: A patron’s driver’s license is the preferred method for verifying the patron’s identity. A passport, non-resident alien identification card, other government issued identification credential or another picture identification credential normally acceptable as a means of identification when cashing checks, may also be used.
      
      3) The dollar amount of the patron’s initial deposit.
      4) The patron’s slot wagering account number.
      5) The date the patron’s account is opened.
64. Procedures are in place to provide a secure method for a patron to access a wagering account.

65. Prior to the patron making a cash withdrawal from a wagering account, the cashier must verify the identity of the patron and availability of funds through the cashless wagering system.

66. A deposit/withdrawal, other than through actual slot machine play, is evidenced by at least a two-part document, with one part remaining in the cashier’s area and the other part given to the patron when a deposit or withdrawal is made. An adjustment to a patron’s wagering account is also documented and maintained.

67. The document contains the following information:
   a. Same document number on all copies.
   b. Patron’s name or other unique identifier of the patron, account number, and signature.
      Note: Adjustments to the wagering account do not require the patron’s signature.
   c. Date of deposit/withdrawal or account adjustment.
   d. Dollar amount of deposit/withdrawal or account adjustment.
   e. Nature of deposit/withdrawal (e.g. cash, check, chips).
   f. Reason for adjustment to wagering account, if applicable.
   g. Signature of employee handling the transaction.

68. Adjustments to wagering accounts are made by personnel authorized by management.

69. Procedures are established to maintain a detailed record for each patron’s wagering account that includes the dollar amount of all funds deposited and withdrawn specifically to or from the slot wagering account, account adjustments made, and the transfers to/from slot machines. This record is available to the patron upon request.

70. The total of all slot wagering accounts is reconciled by employees of the designated area of accountability, as follows:
   a. For each shift, generate a report from the cashless wagering system that details the beginning and ending balance of wagering accounts, adjustments to wagering accounts, and the wagering account transfers to and from slot machines.
   b. Reconcile the ending and beginning balances (per the system) to the hard copy deposit/withdrawal documentation, account adjustment documentation, and the wagering account transfers (per the system).

71. All slot wagering account deposits/withdrawals, account adjustments, and wagering account transfers to/from slot machines are summarized in total on an accountability form on at least a per shift basis.

72. Slot department wagering account revenue (transfers to slot machines less transfers from slot machines) is summarized and posted as a single line item on an accountability form on at least a daily basis.
Slot Electronic Funds Transfers

Note: A debit instrument electronic funds transfer is a transfer of funds from an external financial institution to a slot machine through the use of a cashless wagering system.

73. Only one specific bank account is used to record all debit instrument electronic funds transfers into slot machines. This account is not used for any other types of transactions.

Slot Machine Performance

74. Records are maintained for each machine which indicate the following:

b. Date the machine was placed into service.
c. Date the machine was removed from operation.
d. Any changes in machine numbers and designations.
e. Dates and type of changes made and the recalculation of theoretical hold as a result of the changes.
f. For multi-game or multi-game/multi-denomination machines, the initial paytable numbers activated for play along with each paytable’s theoretical hold percentage, and the simple average of the theoretical hold percentages of the paytables activated for play.

75. Accurate and current theoretical hold worksheets are maintained or readily available for each slot machine on premises at the licensed location.

76. The master game program number, par percentage, and the paytable are verified to the par sheet when initially received from the manufacturer.

77. When multi-game or multi-game/multi-denomination machines are initially placed on the casino floor and when the active paytables within the slot machine are changed, the theoretical hold percentage used in the slot analysis report is a simple average of the theoretical holds, as set by the manufacturer, of all the active paytables of the slot machine. The slot analysis report is revised to indicate the new simple average theoretical hold percentage whenever a change is made to the active paytables within the slot machine.

Note 1: For multi-game and multi-game/multi-denomination machines, a new machine number is not assigned when paytables are changed within the same library of paytables.

Note 2: The theoretical hold percentage needs to be obtained for each active paytable when multi-game/multi-denomination machines have different paytables for each denomination within a game that are activated for play.

78. Machine coin-in meter readings are recorded at least monthly and retained at least five years.

79. Slot machine bill-in meter readings are recorded when the currency acceptor drop box is removed. The bill-in meter readings, by slot machine, are documented and maintained.
80. If a count team employee manually reads and records the bill-in meters, that employee is assigned on a rotating basis unless the in-meter readings are randomly verified quarterly for all currency acceptors by someone other than the regular in-meter reader.

81. Upon receipt of the meter reading summary, the accounting department reviews all coin-in meter readings for reasonableness using pre-established parameters.

82. Prior to final preparation of statistical reports, coin-in meter readings that do not appear reasonable are reviewed with slot department employees, and exceptions documented, so that meters can be repaired or clerical errors in the recording of meter readings can be corrected. The final statistical report is reviewed to ensure that the correct coin-in dollar amount has been recorded.

Note: When the correct coin-in amount cannot be determined (i.e., coin-in not recorded properly due to slot machine meter or system failure), the preferred method for recalculating a reasonable coin-in amount is to use the actual average coin-in for the machine in question over the past several drop periods.

83. A report is produced at least monthly showing accurate month-to-date, year-to-date, and if practicable, life-to-date actual hold percentage computations for individual machines and a comparison to each machine’s theoretical hold percentage previously discussed.

Note 1: Actual hold = dollar amount of slot machine statistical win divided by dollar amount of coin-in. The wagering activity recorded on the coin-in meter of the slot machine includes all cashable and non-cashable credits wagered. The slot machine statistical win represents all drop and payout activity occurring through the slot machine regardless of whether the activity is subject to gross gaming revenue taxation. The drop and payout activity occurring through the slot machine includes the following:

  a. The payout activity represents only slot machine payouts associated with the manufacturer’s paytable of the slot machine. Jackpot payouts (as defined by Regulation 1.140) and fills recorded in the slot analysis report do not include promotional payouts and/or bonus payouts that are not reflected on the paytable of the slot machine and/or not included in the calculation of the slot machine’s theoretical hold percentage.

  b. The drop activity recorded in the slot analysis report includes all amounts placed into the coin or bill acceptor of the slot machine (e.g., free play wagering instruments accepted by the bill validator of the slot machine are included in the drop amount) or electronic money transfers made to the slot machine for wagering purposes.

As a result, the slot machine statistical win recorded in the slot analysis report may not equal the amount of win reported on the NGC tax returns.

Note 2: All categories required in Section A of the NGC-31 must be reflected in this report.

Note 3: “Life-to-Date” represents at least a previous two-year cumulative basis.
84. The theoretical hold percentages used in the slot analysis reports should be within the performance standards set by the manufacturer, less any progressive percentage contributions, and should not include other fees (e.g., a percentage payment to operators of inter-casino linked slot machines).

85. Slot machines with identical program (EPROM) numbers are included in the slot analysis reports using the same theoretical hold percentage. When a range is involved, the theoretical hold percentage used is consistent among games.

86. The theoretical hold percentage used in the slot analysis report represents theoretical performance of the slot machine’s paytable and excludes promotional payouts and bonus payouts not included in the slot machine’s paytable.

87. Promotional payouts and/or bonus payouts, not reflected on the paytable of the slot machine and/or not included in the calculation of the slot machine’s theoretical hold percentage, are not included in slot machine statistical win for statistical performance purposes in the slot statistical reports. However, these payouts may be included in the slot statistical report for the calculation of slot machine reportable win reported in the NGC tax returns.

Note: Refer to “Note 1” of ICP #83 for further explanation.

88. Each change to a slot machine's theoretical hold percentage, including progressive percentage contributions, results in that machine being identified as a different machine in the statistical reports (i.e., not commingling various hold percentages).

Note 1: For multi-game and multi-game/multi-denomination machines, a new machine number is not assigned when paytables are changed within the same library of paytables.

Note 2: A new machine number is not assigned when a new par percentage used in the statistical reports is a result of a correction of an inaccurate par percentage.

89. The statistical reports are reviewed and initialed by management on at least a monthly basis. Large variations between theoretical hold and actual hold, by machine and by denomination (including the multi-denominational category), are investigated and resolved with the findings documented no later than 30 days after the generation of the statistical report.

90. Updates to the slot machine computer data files to reflect additions, deletions or movements of slot machines are made at least weekly, and prior to in-meter readings and the slot count process.

Miscellaneous

91. The conditions for participating in promotional events, including drawings and giveaway programs, are prominently displayed or available for patron review at the licensed location.
92. When machines are temporarily removed from the floor, slot coin drop, currency drop and hopper contents are removed from the slot machine and properly stored in a secured area to preclude the misappropriation of stored funds. When machines are permanently removed from the floor, the slot coin drop, currency drop and hopper contents are removed from the slot machine and properly stored in a secured area until counted and recorded by two employees in the count room with appropriate documentation being routed to the accounting department for proper recording and accounting for initial hopper loads.

Note: Permanent removal of a machine from the floor requires an adjustment to the general ledger to reduce the initial hopper load asset account by the dollar amount of the initial hopper load asset amount. Additionally, the dollar amount of the initial hopper load is not included in gross gaming revenue. The difference between the hopper contents and the initial hopper load dollar amount is included in the slot revenue computation.

93. All slot machines with potential jackpots in excess of an amount determined by management (not to exceed $100,000) must have the circuit boards locked or physically sealed. The lock or seal should necessitate the presence of a licensee, licensed key employee, or management personnel independent of the slot department to access the device game program EPROM. If a seal is used to secure the board to the frame of the gaming device, it must be identifiable (e.g., pre-numbered).

Note: This procedure does not apply to slot machines connected to an inter-casino linked system if the following conditions apply:

a. The key or seal to the circuit board is maintained by the operator of the system, and the location employees do not have access to the key or seal, and
b. The location employees maintain the slot machine door key, and the operator of the system does not have access to the slot machine door key.

EPROM Duplication

Note 1: EPROM duplication may only be performed by a licensed manufacturer or a licensee who has received Board approval to duplicate EPROMs.

Note 2: The EPROMs of some manufacturers may be protected by federal copyright laws. The licensee should insure that all applicable laws are complied with when duplicating EPROMs.

Note 3: Equivalent controls must be in place should gaming device program storage media approved by the Board, other than EPROMs, be duplicated.

Note 4: A master game program EPROM is an EPROM that is secured from unrestricted access immediately when received from the manufacturer and after being verified to the manufacturer’s par sheet. It also could be an EPROM from a slot machine that has been tested by personnel independent of the slot department or outside vendor immediately prior to duplication to ensure that the EPROM is a Board-approved program that has not been tampered with.
94. Procedures are developed and implemented for the following:

   a. Copying from the master game program EPROM to another EPROM.
   b. Verification of duplicated EPROMs prior to being offered for play.
   c. Destruction, as needed, of EPROMs with electrical failures.
   d. Securing the EPROM duplicator and master game EPROMs from unrestricted access.

95. Records must be maintained documenting the above procedures. The documentation must include the following information:

   a. Date.
   b. Number of machine in which a duplicated EPROM is placed. Additionally, indicate the number of the slot machine of the source EPROM when duplicated from an EPROM of another slot machine.
   c. Manufacturer.
   d. Program number.
   e. Personnel involved.
   f. Reason for duplication.
   g. Disposition of any permanently removed EPROM.
   h. GCB Lab approval number.

96. EPROMs placed in gaming devices must include the date and information identical to that shown on the manufacturer's label.

97. Computerized Player Tracking, Promotional Accounts, Promotion and External Bonusing Systems

Note: Compliance with the following standards is required for all computerized player tracking, promotional accounts, promotion and external bonusing systems.

98. The player tracking, promotional accounts, promotion and external bonusing systems are secured so as to prevent unauthorized access (e.g., changing passwords at least quarterly and physical access to computer hardware, etc.).

99. The issuance of wagering instruments, other than through actual slot machine play or through the purchase of wagering instruments by the patron at a cashier's station, is prohibited.

99. Employees who redeem points for members cannot have access to inactive or closed accounts without supervisory personnel authorization.
100. The addition/deletion of points to player tracking accounts and the addition/deletion of cashable credits and non-cashable credits to promotional accounts other than through actual slot machine play must be sufficiently documented (including substantiation of reasons for increases) and authorized/performed by supervisory personnel of the player tracking, promotions, or slot department. The addition/deletion of points to player tracking accounts and the addition/deletion of cashable credits and non-cashable credits to promotional accounts authorized by supervisory personnel is documented and is randomly verified by accounting personnel on a quarterly basis.

Note: This standard does not apply to the deletion of points related to inactive or closed accounts through an automated process.

101. Patron identification is required when redeeming points without a slot card.

102. Changes to the player tracking system parameters, such as point structures and employee access, must be performed by supervisory employees independent of the slot department. Alternatively, changes to player tracking system parameters may be performed by slot supervisory employees if sufficient documentation is generated and the propriety of the changes are randomly verified by supervisory employees independent of the slot department on a monthly basis.

103. Changes to the promotional accounts, promotion and external bonusing system parameters, such as the awarding of bonuses, the issuance of cashable credits, non-cashable credits, wagering instruments and employee access, must be performed by supervisory employees independent of the slot department. Alternatively, changes to promotional accounts, promotion and external bonusing system parameters may be performed by slot supervisory employees if sufficient documentation is generated and the propriety of the changes are randomly verified by supervisory employees independent of the slot department on a monthly basis.

104. All other changes to the player tracking, promotional accounts, promotion and external bonusing systems must be appropriately documented.

Contests/Tournaments

Note: The following controls apply to any promotional item with a payout of at least $500.

105. All contest/tournament entry fees and prize payouts (including mail transactions) are summarized on an accountability document on a daily basis.

106. When contest/tournament entry fees and payouts are transacted, they are recorded on a document which contains:

   a. Patron’s name.
   b. Date of entry/payout.
   c. Dollar amount of entry fee/payout.
   d. Signature or initials of individual completing transaction
   e. Name of contest/tournament.
107. The contest/tournament entry fees and payouts are summarized and posted to the accounting records on at least a monthly basis.

108. Contest/tournament rules are included on all entry forms/brochures and are prominently displayed or available for patron review at the licensed location. The rules must include at a minimum:
   a. All conditions patrons must meet to qualify for entry into, and advancement through, the contest/tournament.
   b. Specific information pertaining to any single contest/tournament, including the dollar amount of money placed into the prize pool.
   c. The distribution of funds based on specific outcomes.

109. Results of each contest/tournament are recorded and available for participants to review. The recording includes the name of the event, date(s) of event, total number of entries, dollar amount of entry fees, total prize pool, and the dollar amount paid for each winning category. The name of each winner is recorded and maintained but not made available to the participants unless authorized by management personnel.

   Note: The total number of entries is not required for a free-entry contest/tournament.

110. The aforementioned promotional payout and contest/tournament records are maintained for each event.

**Slot Accounting/Audit Procedures**

111. Slot accounting/audit procedures are performed by employees who are independent of the transactions being reviewed.

   Note: For locations with 50 slot machines or less, the person performing the slot accounting/audit procedures does not need to be independent of the transactions being reviewed.

112. The following procedures are performed by accounting personnel using the count document completed by the count team members:

   a. Foot the count sheet(s) and reconcile the dollar amount of coin/currency drop proceeds on the count sheet to the dollar amount recorded in the applicable accountability document and to the slot statistical reports. Investigate and document any variance noted.
   b. Examine for propriety of signatures.

   Note: For computer systems, only one drop period for each calendar quarter must be footed with the total being traced to the amount recorded in the computer system drop reports. However, the total from the computer system drop reports must be traced to the total drop amount recorded in the casino accountability document and to the slot statistical reports for all drop periods.
113. Accounting personnel shall review all manual slot payout (includes promotional payouts) and fill forms for proper completion, and reconcile all parts of each form to the restricted copy. Additionally, all computer payout and fill forms prepared as a result of a computer system override and all voided sequentially numbered payout forms should be reviewed for propriety and for proper completion.

114. Accounting personnel shall foot all slot payout (includes promotional payout) and fill forms and trace the total to the total payout and fill amounts recorded by the cashier in their accountability document and to the slot statistical reports.

Note: For computer systems, only one drop period for each calendar quarter must be footed with the total being traced to the amount recorded in the computer system payout and fill reports. However, the total from the computer system payout and fill reports must be traced to the total payout and fill amounts recorded by the cashier in their accountability document and to the slot statistical reports for all drop periods.

115. Accounting personnel shall produce a report that compares the bill-in meter readings to the currency acceptor drop amounts for each machine. Accounting personnel shall perform follow-up on any one machine having an unresolved variance in excess of $50 or ten percent (whichever is less) between actual drop and bill-in meter readings. Discrepancies should be resolved prior to the generation/distribution of slot count reports and slot statistical reports. The follow-up performed and results of investigation must be documented and maintained.

Note: The reconciliation and any follow-up required must not be performed by a member of the count team.

116. A report is produced that compares cashless wagering system wagering instruments accepted to the wagering instruments counted in the count room (e.g., vouchers and coupons) for each slot machine dropped. Variances, by slot machine, noted in the reports that are in excess of $50 or 10% (whichever amount is less) are reviewed by accounting department personnel. The results of the variance investigation, including the date of and personnel involved in the investigations, are documented in the report and retained. The results shall also include any corrective action taken (e.g., meter replaced, interface component repaired, software debugged, etc.). The investigation is completed and the results are documented within seven days of the day the variance was noted.

117. Each month accounting personnel shall prepare documentation that supports the dollar amount of expired wagering instruments that are included in the computation of revenue in the NGC tax returns.

118. Accounting employees review exception reports for all computerized slot systems on a weekly basis for propriety of transactions and unusual occurrences. All noted improper transactions or unusual occurrences are investigated with the results documented.
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119. For one cashier per week (the cashier selected for auditing must be rotated), accounting personnel shall foot the wagering instruments and/or payout receipts redeemed and trace the totals to the totals recorded in the system and to the amount recorded in the applicable cashier’s accountability document.

120. Accounting personnel shall ensure all slot promotional coupons redeemed that are deducted from revenue (i.e., coupons that cannot be accepted by a slot machine for wagering purposes) are properly canceled to prevent improper recirculation.

121. Accounting personnel shall reconcile issued, voided, and redeemed wagering instruments to the unpaid and expired wagering instruments dollar amount using the reports produced by the system. Any variances noted should be investigated and documented.

122. Accounting personnel shall reconcile the dollar amount of wagering account deposit, withdrawal and account adjustment forms to the dollar amount recorded on the accountability form and cashless wagering system reports.

123. At least quarterly, for each wagering instrument redemption machine, accounting personnel shall foot the wagering instruments and payout receipts redeemed and trace the totals to the totals recorded in the system and the related accountability document.

124. Accounting personnel shall reconcile the dollar amount of debit instrument electronic funds transfers as recorded in the cashless wagering system reports to the dollar amount processed and recorded by the outside entity, and to the dollar amount indicated in the bank account records.

125. Accounting personnel shall verify that the debit instrument electronic funds transfers recorded in the cashless wagering system reports did not exceed the daily transfer limit per debit instrument specified in regulation.

126. For computerized player tracking systems, an accounting employee shall perform the following procedures at least one day per quarter:
   a. Foot all points-redeemed documentation and trace to the system-generated totals.
   b. Review all points-redeemed documentation for propriety.

127. At least annually, all computerized player tracking, promotional accounts, promotion and external bonusing slot systems (in-house developed and vendor systems) are reviewed by personnel independent of the individuals that set up or make changes to the system parameters. The review is performed to determine that the configuration parameters are accurate and that the configuration parameters have not been altered without appropriate management authorization (e.g., player tracking system - verify the accuracy of the awarding of points based on the dollar amount wagered). The system should also be tested, if possible, to further verify the accuracy of the configuration parameters (e.g., player tracking system - wager at the slot machine to verify the accuracy of the amount of points awarded). The test results are documented and maintained.
128. Accounting personnel shall reconcile all contest/tournament entry and payout forms to the dollar amounts recorded in the appropriate accountability document.

129. For all promotional payouts (including payouts resulting from computerized player tracking activity), and any contests, tournaments, drawings, and giveaway programs with a single payout of at least $500, the following documentation is maintained:
   a. Copies of the information provided to the patrons describing the contests, tournaments, promotional payouts, drawings, and giveaway programs (i.e., brochures, flyers).
   b. Effective dates.
   c. Accounting treatment, including general ledger accounts, if applicable.

130. Monthly, accounting personnel shall review all contests, tournaments, promotional payouts, drawings, and giveaway programs to determine proper accounting treatment and proper win/loss computation.

131. Monthly, accounting personnel shall perform procedures (e.g., interviews, review of payout documentation, etc.) to ensure that contests, tournaments, promotional payouts, drawings, and giveaway programs are conducted in accordance with the conditions provided to the patrons. For any contest/tournament, accounting personnel shall reconcile the contest/tournament entry fees collected to the actual contest/tournament payouts made. This reconciliation is to determine whether based on the entry fees collected, the payouts made and the amounts withheld by the gaming establishment, if applicable, were distributed in accordance with the contest/tournament rules.

132. For weigh scale interface systems and currency counter interface systems, for a least one drop period per quarter accounting employees shall compare the totals on the weigh tape/currency counter report to the system-generated weigh/currency count recorded in the slot statistical report. Discrepancies should be resolved prior to generation/distribution of slot count reports and the slot analysis report.

133. At least quarterly, accounting personnel review the personnel access listing of all computerized systems for appropriate functions an employee can perform.
134. For computerized key security systems controlling access to slot drop and count keys, accounting personnel will perform the following procedures:

   a. Monthly, accounting personnel independent of the system administrator review the report generated by the computerized key security system indicating the transactions performed by the individual(s) that adds, deletes, and changes user’s access within the system (i.e., system administrator). Determine whether the transactions completed by the system administrator provide an adequate control over the access to the slot drop and count keys. Also, determine whether any slot drop and count key(s) removed or returned to the key cabinet by the system administrator was properly authorized.

   b. For at least one day each month, review the report generated by the computerized key security system indicating all transactions performed to determine whether any unusual slot drop and count key removals or key returns occurred.

   c. At least quarterly, review the list of users that are assigned access to the slot drop and count keys to determine that their access to the assigned keys is adequate relative to their job position.

   d. All noted improper transactions or unusual occurrences are investigated with the results documented.

135. Annually, an inventory of all slot department keys addressed in these procedures, including drop and count keys, is performed and reconciled to records of keys made, issued, and destroyed. Investigations are performed for all keys unaccounted for, with the investigation being documented.

136. Documentation (e.g., a log, checklist, notation on reports, and tapes attached to original documents) is maintained evidencing the performance of slot audit procedures, the exceptions noted and any follow-up of all slot audit exceptions. All changes made to slot documents by accounting personnel are distinguishable (e.g., made in red ink) from those made during the preparation of the document.

137. Slot machine wagering instruments and payout receipts generated at the slot machine may only be retained for a minimum of 14 days if the following conditions are met:

   a. All information on the wagering instrument is contained on a separate report.

   b. The wagering instruments do not contain signatures or other evidence of internal control procedures having been performed.

   c. The wagering instruments/payout receipts have been classified as “redeemed” or “expired” within the CWS/payout receipt system.

   **Payout Procedures for Mail-In Slot Machine Wagering Vouchers/Payout Receipts**

138. Accounting or management personnel receive the original wagering vouchers/payout receipts.

139. Accounting or management personnel record the wagering voucher/payout receipt on a log as a mail pay. The log includes the date received, patron’s name, wagering voucher/payout receipt number and dollar amount.
140. The wagering vouchers/payout receipts are entered into the computer system for validation and then cancellation as a mail pay.

141. Accounting or management personnel compare the “paid” wagering vouchers/payout receipts to the mail pay log and the system report for paid wagering vouchers/payout receipts. Any discrepancies are documented and reviewed with management personnel.

142. Accounting or management personnel, independent of the individual(s) that processed the mail pay wagering voucher/payout receipt, review the patron’s correspondence submitted, the wagering voucher/payout receipt, the mail pay log and the system report for “paid” wagering vouchers/payout receipts for any discrepancies. Any discrepancies are documented and resolved prior to remitting the proper payment amount to the patron.