

TABLE GAMES

Section 542.12 Updated through May 11, 2006

§ 542.12 What are the minimum internal control standards for table games?

- (a) *Computer applications.* For any computer applications utilized, alternate documentation and/or procedures that provide at least the level of control described by the standards in this section, as approved by the Tribal gaming regulatory authority, will be acceptable.
- (b) *Standards for drop and count.* The procedures for the collection of the table game drop and the count thereof shall comply with §542.21, §542.31, or §542.41 (as applicable).
- (c) *Fill and credit standards.*
 - (1) Fill slips and credit slips shall be in at least triplicate form, and in a continuous, prenumbered series. Such slips shall be concurrently numbered in a form utilizing the alphabet and only in one series at a time. The alphabet need not be used if the numerical series is not repeated during the business year.
 - (2) Unissued and issued fill/credit slips shall be safeguarded and adequate procedures shall be employed in their distribution, use, and control. Personnel from the cashier or pit departments shall have no access to the secured (control) copies of the fill/credit slips.
 - (3) When a fill/credit slip is voided, the cashier shall clearly mark "void" across the face of the original and first copy, the cashier and one other person independent of the transactions shall sign both the original and first copy, and shall submit them to the accounting department for retention and accountability.
 - (4) Fill transactions shall be authorized by pit supervisory personnel before the issuance of fill slips and transfer of chips, tokens, or cash equivalents. The fill request shall be communicated to the cage where the fill slip is prepared.
 - (5) At least three parts of each fill slip shall be utilized as follows:
 - (i) One part shall be transported to the pit with the fill and, after the appropriate signatures are obtained, deposited in the table game drop box;
 - (ii) One part shall be retained in the cage for reconciliation of the cashier bank; and
 - (iii) For computer systems, one part shall be retained in a secure manner to insure that only authorized persons may gain access to it. For manual systems, one part shall be retained in a secure manner in a continuous unbroken form.
 - (6) For Tier C gaming operations, the part of the fill slip that is placed in the table game drop box shall be of a different color for fills than for credits, unless the type of transaction is clearly distinguishable in another manner (the checking of a box on the form shall not be a clearly distinguishable indicator).
 - (7) The table number, shift, and amount of fill by denomination and in total shall be noted on all copies of the fill slip. The correct date and time shall be indicated on at least two copies.
 - (8) All fills shall be carried from the cashier's cage by a person who is independent of the cage or pit.
 - (9) The fill slip shall be signed by at least the following persons (as an indication that each has counted the amount of the fill and the amount agrees with the fill slip):
 - (i) Cashier who prepared the fill slip and issued the chips, tokens, or cash equivalent;
 - (ii) Runner who carried the chips, tokens, or cash equivalents from the cage to the pit;
 - (iii) Dealer or boxperson who received the chips, tokens, or cash equivalents at the gaming table; and
 - (iv) Pit supervisory personnel who supervised the fill transaction.
 - (10) Fills shall be broken down and verified by the dealer or boxperson in public view before the dealer or boxperson places the fill in the table tray.
 - (11) A copy of the fill slip shall then be deposited into the drop box on the table by the dealer, where it shall appear in the soft count room with the cash receipts for the shift.

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- (12) Table credit transactions shall be authorized by a pit supervisor before the issuance of credit slips and transfer of chips, tokens, or other cash equivalent. The credit request shall be communicated to the cage where the credit slip is prepared.
 - (13) At least three parts of each credit slip shall be utilized as follows:
 - (i) Two parts of the credit slip shall be transported by the runner to the pit. After signatures of the runner, dealer, and pit supervisor are obtained, one copy shall be deposited in the table game drop box and the original shall accompany transport of the chips, tokens, markers, or cash equivalents from the pit to the cage for verification and signature of the cashier.
 - (ii) For computer systems, one part shall be retained in a secure manner to insure that only authorized persons may gain access to it. For manual systems, one part shall be retained in a secure manner in a continuous unbroken form.
 - (14) The table number, shift, and the amount of credit by denomination and in total shall be noted on all copies of the credit slip. The correct date and time shall be indicated on at least two copies.
 - (15) Chips, tokens, and/or cash equivalents shall be removed from the table tray by the dealer or boxperson and shall be broken down and verified by the dealer or boxperson in public view prior to placing them in racks for transfer to the cage.
 - (16) All chips, tokens, and cash equivalents removed from the tables and markers removed from the pit shall be carried to the cashier's cage by a person who is independent of the cage or pit.
 - (17) The credit slip shall be signed by at least the following persons (as an indication that each has counted or, in the case of markers, reviewed the items transferred):
 - (i) Cashier who received the items transferred from the pit and prepared the credit slip;
 - (ii) Runner who carried the items transferred from the pit to the cage;
 - (iii) Dealer who had custody of the items prior to transfer to the cage; and
 - (iv) Pit supervisory personnel who supervised the credit transaction.
 - (18) The credit slip shall be inserted in the drop box by the dealer.
 - (19) Chips, tokens, or other cash equivalents shall be deposited on or removed from gaming tables only when accompanied by the appropriate fill/credit or marker transfer forms.
 - (20) Cross fills (the transfer of chips between table games) and even cash exchanges are prohibited in the pit.
- (d) *Table inventory forms.*
- (1) At the close of each shift, for those table banks that were opened during that shift:
 - (i) The table's chip, token, coin, and marker inventory shall be counted and recorded on a table inventory form; or
 - (ii) If the table banks are maintained on an imprest basis, a final fill or credit shall be made to bring the bank back to par.
 - (2) If final fills are not made, beginning and ending inventories shall be recorded on the master game sheet for shift win calculation purposes.
 - (3) The accuracy of inventory forms prepared at shift end shall be verified by the outgoing pit supervisor and the dealer. Alternatively, if the dealer is not available, such verification may be provided by another pit supervisor or another supervisor from another gaming department. Verifications shall be evidenced by signature on the inventory form.
 - (4) If inventory forms are placed in the drop box, such action shall be performed by a person other than a pit supervisor.

(e) *Table games computer generated documentation standards.*

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- (1) The computer system shall be capable of generating adequate documentation of all information recorded on the source documents and transaction detail (e.g., fill/credit slips, markers, etc.).
 - (2) This documentation shall be restricted to authorized personnel.
 - (3) The documentation shall include, at a minimum:
 - (i) System exception information (e.g., appropriate system parameter information, corrections, voids, etc.); and
 - (ii) Personnel access listing, which includes, at a minimum:
 - (A) Employee name or employee identification number (if applicable); and
 - (B) Listing of functions employees can perform or equivalent means of identifying the same.
- (f) *Standards for playing cards and dice.*
- (1) Playing cards and dice shall be maintained in a secure location to prevent unauthorized access and to reduce the possibility of tampering.
 - (2) Used cards and dice shall be maintained in a secure location until marked, scored, or destroyed, in a manner as approved by the Tribal gaming regulatory authority, to prevent unauthorized access and reduce the possibility of tampering.
 - (3) The Tribal gaming regulatory authority, or the gaming operation as approved by the Tribal gaming regulatory authority, shall establish and the gaming operation shall comply with a reasonable time period, which shall not exceed seven (7) days, within which to mark, cancel, or destroy cards and dice from play.
 - (i) This standard shall not apply where playing cards or dice are retained for an investigation.
 - (ii) [Reserved]
 - (4) A card control log shall be maintained that documents when cards and dice are received on site, distributed to and returned from tables and removed from play by the gaming operation.
- (g) *Plastic cards.* Notwithstanding paragraph (f) of this section, if a gaming operation uses plastic cards (not plastic-coated cards), the cards may be used for up to three (3) months if the plastic cards are routinely inspected, and washed or cleaned in a manner and time frame approved by the Tribal gaming regulatory authority.
- (h) *Standards for supervision.* Pit supervisory personnel (with authority equal to or greater than those being supervised) shall provide supervision of all table games.
- (i) *Analysis of table game performance standards.*
- (1) Records shall be maintained by day and shift indicating any single-deck blackjack games that were dealt for an entire shift.
 - (2) Records reflecting hold percentage by table and type of game shall be maintained by shift, by day, cumulative month-to-date, and cumulative year-to-date.
 - (3) This information shall be presented to and reviewed by management independent of the pit department on at least a monthly basis.
 - (4) The management in paragraph (i)(3) of this section shall investigate any unusual fluctuations in hold percentage with pit supervisory personnel.
 - (5) The results of such investigations shall be documented, maintained for inspection, and provided to the Tribal gaming regulatory authority upon request.

(j) *Accounting/auditing standards.*

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- (1) The accounting and auditing procedures shall be performed by personnel who are independent of the transactions being audited/accounted for.
- (2) If a table game has the capability to determine drop (*e.g.*, bill-in/coin-drop meters, bill acceptor, computerized record, etc.) the dollar amount of the drop shall be reconciled to the actual drop by shift.
- (3) Accounting/auditing employees shall review exception reports for all computerized table games systems at least monthly for propriety of transactions and unusual occurrences.
- (4) All noted improper transactions or unusual occurrences shall be investigated with the results documented.
- (5) Evidence of table games auditing procedures and any follow-up performed shall be documented, maintained for inspection, and provided to the Tribal gaming regulatory authority upon request.
- (6) A daily recap shall be prepared for the day and month-to-date, which shall include the following information:
 - (i) Drop;
 - (ii) Win; and
 - (iii) Gross revenue.

(k) *Marker credit play.*

- (1) If a gaming operation allows marker credit play (exclusive of rim credit and call bets), the following standards shall apply:
 - (i) A marker system shall allow for credit to be both issued and repaid in the pit.
 - (ii) Prior to the issuance of gaming credit to a player, the employee extending the credit shall contact the cashier or other independent source to determine if the player's credit limit has been properly established and there is sufficient remaining credit available for the advance.
 - (iii) Proper authorization of credit extension in excess of the previously established limit shall be documented.
 - (iv) The amount of credit extended shall be communicated to the cage or another independent source and the amount documented within a reasonable time subsequent to each issuance.
 - (v) The marker form shall be prepared in at least triplicate form (triplicate form being defined as three parts performing the functions delineated in the standard in paragraph (k)(1)(vi) of this section), with a preprinted or concurrently printed marker number, and utilized in numerical sequence. (This requirement shall not preclude the distribution of batches of markers to various pits.)
 - (vi) At least three parts of each separately numbered marker form shall be utilized as follows:
 - (A) Original shall be maintained in the pit until settled or transferred to the cage;
 - (B) Payment slip shall be maintained in the pit until the marker is settled or transferred to the cage. If paid in the pit, the slip shall be inserted in the table game drop box. If not paid in the pit, the slip shall be transferred to the cage with the original;
 - (C) Issue slip shall be inserted into the appropriate table game drop box when credit is extended or when the player has signed the original.
 - (vii) When marker documentation (*e.g.*, issue slip and payment slip) is inserted in the drop box, such action shall be performed by the dealer or boxperson at the table.

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- (viii) A record shall be maintained that details the following (e.g., master credit record retained at the pit podium):
 - (A) The signature or initials of the person(s) approving the extension of credit (unless such information is contained elsewhere for each issuance);
 - (B) The legible name of the person receiving the credit;
 - (C) The date and shift of granting the credit;
 - (D) The table on which the credit was extended;
 - (E) The amount of credit issued;
 - (F) The marker number;
 - (G) The amount of credit remaining after each issuance or the total credit available for all issuances;
 - (H) The amount of payment received and nature of settlement (e.g., credit slip number, cash, chips, etc.); and
 - (I) The signature or initials of the person receiving payment/settlement.
- (ix) The forms required in paragraphs (k)(1)(v), (vi), and (viii) of this section shall be safeguarded, and adequate procedures shall be employed to control the distribution, use, and access to these forms.
- (x) All credit extensions shall be initially evidenced by lammer buttons, which shall be displayed on the table in public view and placed there by supervisory personnel.
- (xi) Marker preparation shall be initiated and other records updated within approximately one hand of play following the initial issuance of credit to the player.
- (xii) Lammer buttons shall be removed only by the dealer or boxperson employed at the table upon completion of a marker transaction.
- (xiii) The original marker shall contain at least the following information:
 - (A) Marker number;
 - (B) Player's name and signature;
 - (C) Date; and
 - (D) Amount of credit issued.
- (xiv) The issue slip or stub shall include the same marker number as the original, the table number, date and time of issuance, and amount of credit issued. The issue slip or stub shall also include the signature of the person extending the credit, and the signature or initials of the dealer or boxperson at the applicable table, unless this information is included on another document verifying the issued marker.
- (xv) The payment slip shall include the same marker number as the original. When the marker is paid in full in the pit, it shall also include the table number where paid, date and time of payment, nature of settlement (cash, chips, etc.), and amount of payment. The payment slip shall also include the signature of pit supervisory personnel acknowledging payment, and the signature or initials of the dealer or boxperson receiving payment, unless this information is included on another document verifying the payment of the marker.
- (xvi) When partial payments are made in the pit, a new marker shall be completed reflecting the remaining balance and the marker number of the marker originally issued.
- (xvii) When partial payments are made in the pit, the payment slip of the marker that was originally issued shall be properly cross-referenced to the new marker number, completed with all information required by paragraph (k)(1)(xv) of this section, and inserted into the drop box.
- (xviii) The cashier's cage or another independent source shall be notified when payments (full or partial) are made in the pit so that cage records can be updated for such

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transactions. Notification shall be made no later than when the customer's play is completed or at shift end, whichever is earlier.

- (xix) All portions of markers, both issued and unissued, shall be safeguarded and procedures shall be employed to control the distribution, use and access to the forms.
- (xx) An investigation shall be performed to determine the cause and responsibility for loss whenever marker forms, or any part thereof, are missing. These investigations shall be documented, maintained for inspection, and provided to the Tribal gaming regulatory authority upon request.
- (xxi) When markers are transferred to the cage, marker transfer forms or marker credit slips (or similar documentation) shall be utilized and such documents shall include, at a minimum, the date, time, shift, marker number(s), table number(s), amount of each marker, the total amount transferred, signature of pit supervisory personnel releasing instruments from the pit, and the signature of cashier verifying receipt of instruments at the cage.
- (xxii) All markers shall be transferred to the cage within twenty-four (24) hours of issuance.
- (xxiii) Markers shall be transported to the cashier's cage by a person who is independent of the marker issuance and payment functions (pit clerks may perform this function).

(2) [Reserved]

(l) *Name credit instruments accepted in the pit.*

- (1) For the purposes of this paragraph, name credit instruments means personal checks, payroll checks, counter checks, hold checks, traveler's checks, or other similar instruments that are accepted in the pit as a form of credit issuance to a player with an approved credit limit.
- (2) The following standards shall apply if name credit instruments are accepted in the pit:
 - (i) A name credit system shall allow for the issuance of credit without using markers;
 - (ii) Prior to accepting a name credit instrument, the employee extending the credit shall contact the cashier or another independent source to determine if the player's credit limit has been properly established and the remaining credit available is sufficient for the advance;
 - (iii) All name credit instruments shall be transferred to the cashier's cage (utilizing a two-part order for credit) immediately following the acceptance of the instrument and issuance of chips (if name credit instruments are transported accompanied by a credit slip, an order for credit is not required);
 - (iv) The order for credit (if applicable) and the credit slip shall include the customer's name, amount of the credit instrument, the date, time, shift, table number, signature of pit supervisory personnel releasing instrument from pit, and the signature of the cashier verifying receipt of instrument at the cage;
 - (v) The procedures for transacting table credits at standards in paragraphs (c)(12) through (19) of this section shall be strictly adhered to; and
 - (vi) The acceptance of payments in the pit for name credit instruments shall be prohibited.

(m) *Call bets.*

- (1) The following standards shall apply if call bets are accepted in the pit:

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- (i) A call bet shall be evidenced by the placement of a lammer button, chips, or other identifiable designation in an amount equal to that of the wager in a specific location on the table;
 - (ii) The placement of the lammer button, chips, or other identifiable designation shall be performed by supervisory/boxperson personnel. The placement may be performed by a dealer only if the supervisor physically observes and gives specific authorization;
 - (iii) The call bet shall be settled at the end of each hand of play by the preparation of a marker, repayment of the credit extended, or the payoff of the winning wager. Call bets extending beyond one hand of play shall be prohibited; and
 - (iv) The removal of the lammer button, chips, or other identifiable designation shall be performed by the dealer/ boxperson upon completion of the call bet transaction.
- (2) [Reserved]
- (n) *Rim credit.*
- (1) The following standards shall apply if rim credit is extended in the pit:
 - (i) Rim credit shall be evidenced by the issuance of chips to be placed in a neutral zone on the table and then extended to the customer for the customer to wager, or to the dealer to wager for the customer, and by the placement of a lammer button or other identifiable designation in an amount equal to that of the chips extended; and
 - (ii) Rim credit shall be recorded on player cards, or similarly used documents, which shall be:
 - (A) Prenumbered or concurrently numbered and accounted for by a department independent of the pit;
 - (B) For all extensions and subsequent repayments, evidenced by the initials or signatures of a supervisor and the dealer attesting to the validity of each credit extension and repayment;
 - (C) An indication of the settlement method (e.g., serial number of marker issued, chips, cash);
 - (D) Settled no later than when the customer leaves the table at which the card is prepared;
 - (E) Transferred to the accounting department on a daily basis; and
 - (F) Reconciled with other forms utilized to control the issuance of pit credit (e.g., master credit records, table cards).
- (2) [Reserved]
- (o) *Foreign currency.*
- (1) The following standards shall apply if foreign currency is accepted in the pit:
 - (i) Foreign currency transactions shall be authorized by a pit supervisor/ boxperson who completes a foreign currency exchange form before the exchange for chips or tokens;
 - (ii) Foreign currency exchange forms include the country of origin, total face value, amount of chips/token extended (*i.e.*, conversion amount), signature of supervisor/boxperson, and the dealer completing the transaction;
 - (iii) Foreign currency exchange forms and the foreign currency shall be inserted in the drop box by the dealer; and
 - (iv) Alternate procedures specific to the use of foreign valued gaming chips shall be developed by the Tribal gaming regulatory authority, or the gaming operation as approved by the Tribal gaming regulatory authority.
- (2) [Reserved]

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