

MISSOURI GAMING COMMISSION  
MINIMUM INTERNAL CONTROL STANDARDS  
CHAPTER N – SECURITY

CONTENTS

<u>Section</u>	<u>Page</u>
§ 1. General	N-2
§ 2. Reporting	N-2
§ 3. Public Safety & Public Order	N-2
§ 4. Casino Access Control	N-3
§ 5. Protection of Assets & Card and Dice Integrity	N-4

*Note: Sections 313.800 through 313.850, RSMo, et seq., and Title 11, Division 45 of the Code of State Regulations establish standards to which Class B Licensees must comply. Class B Licensees should review these statutes and rules to ensure their ICS include compliance with the requirements set forth. Revised April 30, 2009 (1.04 deleted \$500 loss limit). Revised January 30, 2011. Revised March 30, 2012. Revised November 30, 2012.*

**MINIMUM INTERNAL CONTROL STANDARDS**  
**CHAPTER N – SECURITY**

**§ 1 General**

- 1.01 Security personnel shall only report to (be supervised by) the general manager. (11 CSR 45-9.020)
- 1.02 Security personnel are not allowed to accept tips, gratuities or gifts of any kind from a patron.
- 1.03 Security personnel are prohibited from participating in any portion of the ticketing process except turnstile readings.

**§ 2 Reporting**

- 2.01 Security personnel shall promptly report to the MGC boat agent on duty any facts which the licensee has reasonable grounds to believe indicate a violation of law (other than minor traffic violations), or commission rules to include state regulations, MICS, Internal Control Systems, and other orders of the commission, committed by licensees, their employees or others, including, without limitation, the performance of licensed activities different from those permitted under their license. The MGC boat agent on duty shall also be immediately notified of all inquiries made by law enforcement or other government officials concerning the conduct of a licensee.
- 2.02 The MGC boat agent on duty shall be provided, on a daily basis, a copy of the Security Incident Log of all Security Incident Reports generated during the gaming day.
- 2.03 The Internal Control System shall include detailed procedures for preparation and processing of Security Incident Reports, including who participates, their duties and responsibilities, signatory requirements, distribution and all applicable controls.

**§ 3 Public Safety & Public Order**

- 3.01 The Internal Control System shall contain detailed procedures, including who participates in each activity, their duties and responsibilities, forms completed, signatory responsibilities, and all applicable controls for the following:
  - (A) firearms prohibition;
  - (B) intoxicated persons;
  - (C) disorderly/disruptive patrons; and
  - (D) eviction procedures.
- 3.02 Security personnel shall be trained to implement the mandatory Emergency Response Plan submitted to the MGC per 11 CSR 45-6.

*Note: Sections 313.800 through 313.850, RSMo, et seq., and Title 11, Division 45 of the Code of State Regulations establish standards to which Class B Licensees must comply. Class B Licensees should review these statutes and rules to ensure their ICS includes compliance with the requirements set forth. Revised April 30, 2009 (1.04 deleted \$500 loss limit). Revised January 30, 2011. Revised March 30, 2012. Revised November 30, 2012.*

**MINIMUM INTERNAL CONTROL STANDARDS**  
**CHAPTER N – SECURITY**

3.03 Designated Emergency Medical Services (EMS) First Responders primary duties are to respond immediately to medical emergencies. Designated Emergency Medical Services (EMS) First Responders shall not be assigned duties that would prevent them from immediately responding to a medical emergency. A designated EMS First Responder shall maintain control as primary care provider unless physically incapable of continuing care, the patient refuses further care, or the patient is transferred to a higher level of care.

**§ 4 Casino Access Control**

4.01 Persons under 21 years of age shall not be permitted access to the casino floor or be allowed to place a wager.

4.02 Persons who are visibly intoxicated shall not be permitted access to or allowed to remain on the casino floor.

4.03 Persons who are visibly intoxicated shall not be allowed to place a wager.

4.04 The enforcement of admission and gambling restrictions for persons under 21 years of age shall include, at a minimum, checking their government-issued photo identification.

4.05 The Internal Control System shall contain detailed procedures for control over the following situations and activities, including who participates in each activity, their duties and responsibilities, forms completed, signatory responsibilities, and all applicable controls for the following:

- (A) enforcement of admissions and gambling restrictions for visibly intoxicated persons;
- (B) employee access to controlled areas;
- (C) lost employee access badges and gaming licenses;
- (D) issuance and return of temporary badges; and
- (E) trespassing, including Disassociated Persons and Excluded Persons.

4.06 Using a method detailed in the Internal Control System, the Class B Licensee shall inform visitor/vendors who may be on the Disassociated Persons list of their responsibility to notify the MGC office at the facility of their status and the expected duration of their presence on the property.

4.07 Visitor/vendor badges shall meet the following criteria. Badges shall be:

- (A) reusable and made of a permanent, durable material such as plastic, metal, or laminated cardstock;

*Note: Sections 313.800 through 313.850, RSMo, et seq., and Title 11, Division 45 of the Code of State Regulations establish standards to which Class B Licensees must comply. Class B Licensees should review these statutes and rules to ensure their ICS includes compliance with the requirements set forth. Revised April 30, 2009 (1.04 deleted \$500 loss limit). Revised January 30, 2011. Revised March 30, 2012. Revised November 30, 2012.*

**MINIMUM INTERNAL CONTROL STANDARDS**  
**CHAPTER N – SECURITY**

- (B) capable of being securely attached to all common clothing types and styles by means of a secure mechanical device so as to prevent loss of the badge during normal activities;
  - (C) individually numbered with numerals at least one-fourth inch (1/4") in height;
  - (D) used in conjunction with the Visitor/Vendor Log;
  - (E) unique in design, color, and construction; easily identifiable as a valid visitor/vendor badge at that facility; and to make duplication or counterfeiting difficult; and
  - (F) displayed on the visitor/vendor's person in a clearly visible manner at all times while on the gaming floor or in non-public areas.
- 4.08 The Internal Control System shall include detailed procedures for the issuance of and accounting for visitor/vendor badges on a daily basis. If badges for contractors or vendors are issued for more than one gaming day special procedures shall also be submitted in the Internal Control System.

**§ 5 Protection of Assets & Card and Dice Integrity**

- 5.01 The Internal Control System shall contain detailed procedures for security's role in the following activities and events, including who participates, their duties and responsibilities, forms completed, signatory responsibilities, and all applicable controls:
- (A) power failure/camera outage;
  - (B) card and dice:
    - (1) inventory;
    - (2) inspection; and
    - (3) cancellation and destruction;
  - (C) panic alarm activations and monthly testing;
  - (D) facility lockdown; and
  - (E) drops.
- 5.02 Security personnel shall not conduct cash transactions or chip or ticket redemptions without approval of the MGC boat agent on duty.
- 5.03 A Security escort shall be required for the movement of all unredeemed tickets, chips, or cash of \$100 or more, except:
- (A) EGD hand-paid jackpots less than \$5,000;
  - (B) transfers between the poker table banks and poker room bank; and
  - (C) non-gaming transfers.

*Note: Sections 313.800 through 313.850, RSMo, et seq., and Title 11, Division 45 of the Code of State Regulations establish standards to which Class B Licensees must comply. Class B Licensees should review these statutes and rules to ensure their ICS includes compliance with the requirements set forth. Revised April 30, 2009 (1.04 deleted \$500 loss limit). Revised January 30, 2011. Revised March 30, 2012. Revised November 30, 2012.*