

Missouri Department of Public Safety
Section 536.175 RSMo APPENDIX A - Periodic Rule Review Report

Date	Name	Rule Number	Rule Title	Support/ Oppose	Comment	Missouri Department of Public Safety Response
7/12/2017	Dwaine Dierksen	11 CSR 30-1.010	Organization and Operations	Support	The Missouri Department of Public Safety does an excellent job.	The Department of Public Safety (DPS) is committed to protecting the people of Missouri.
8/9/2017	Richard Coffey	11 CSR 30-4.010	Definitions	Support	Leave rule intact and assigned to the MSHP.	DPS had determined it is necessary to rescind this rule because it is outdated, in conflict with contemporary statutory language and reiterates the federal and state law regarding the access, use, dissemination and security of criminal history record information already codified in Chapter 43, RSMo, which provides for a central repository for criminal records within the MO State Highway Patrol (MSHP).
8/31/2017	Norm Robinson	11 CSR 30-4.010	Definitions	Support	Strongly urge this program remain intact and continue as the responsibility of the Highway Patrol.	DPS has determined it is necessary to rescind this rule because it is outdated, in conflict with contemporary statutory language and reiterates the federal and state law regarding the access, use, dissemination and security of criminal history record information already codified in Chapter 43, RSMo, which provides for a central repository for criminal records within the MO State Highway Patrol (MSHP).
8/31/2017	Colleen Coble, Executive Director MO Coalition Against Domestic and Sexual Violence	11 CSR 30-5.020	Eligible Applicants	Unknown	DPS does not administer SSVF grants in compliance with existing rules that reference state law exempting non-profit grantees from supplanting. In practice, supplanting issues restrict funding to non-profits in contravention of existing rules. DPS should update rule by providing specific guidance for applicants for SSVF funding.	No revisions proposed at this time. DPS is continuing to review this rule to ensure compliance with both statute and best practice.
8/31/2017	Norm Robinson	11 CSR 30-11.010	MO Uniform Crime Reporting Program	Unknown	Keep the program intact and within the MO State Highway Patrol.	No revisions proposed at this time.
3/13/2017	Sarah Willson, VP of Clinical and Regulatory Affairs, MO Hospital Association	11 CSR 30-12.010	Payments for Sexual Assault Forensic Examinations	Unknown	Member hospitals and providers have voiced concern with having adult and child regulations together.	Adult and child regulations have been separated in the proposed amendment.
8/11/2017	Jennifer Sommerfeld-Sager SAFE-CARE Program Manager Missouri KidsFirst	11 CSR 30-12.010	Payments for Sexual Assault Forensic Examinations	Unknown	Change wording regarding form needing to be "completely" filled out to account for the fact that only one authorization field need be completed. Add statement regarding timeline for submitting corrections or appeals.	The wording has been clarified in the proposed amendment.
8/28/2017	Kendra Eads, Executive Director, Southeast Missouri Network Against Sexual Violence Joy Oesterly, Executive Director Missouri KidsFirst	11 CSR 30-12.010	Payments for Sexual Assault Forensic Examinations	Unknown	Rule currently reads, the "medical provider must ensure that all lines of the form are completely and legibly filled out." However, when a representative of Children's Division or law enforcement authorize the exam, authorization for the exam is not required by the victim/parent/guardian.	The wording has been clarified in the proposed amendment.

8/11/2017	Jennifer Sommerfeld-Sager SAFE-CARE Program Manager Missouri KidsFirst	11 CSR 30-12.010	Payments for Sexual Assault Forensic Examinations	Unknown	Add statement that explains how claims that do not meet emergency guidelines, but are submitted by providers as an emergency exam will be handled.	Meetings with stakeholders were held to discuss the changes. This issue was clarified with the stakeholders and with that understanding, the stakeholders agreed the rule as written did not require any further clarification.
8/28/2017	Kendra Eads, Executive Director Southeast Missouri Network Against Sexual Violence Joy Oesterly, Executive Director Missouri KidsFirst	11 CSR 30-12.010	Payments for Sexual Assault Forensic Examinations	Unknown	Clarification is needed to address the processing of claims submitted by SAFE-CARE providers and appropriate medical providers that are marked as “Emergency” and do not meet the definition of “emergency forensic examination”. While the exam may not meet the definition of emergency, SAFE-CARE providers and appropriate medical providers are still qualified to receive compensation for non-emergency exams. This type of claim has previously been denied, despite the fact that these providers qualify for compensation regardless of emergency status.	Meetings with stakeholders were held to discuss the changes. This issue was clarified with the stakeholders and with that understanding, the stakeholders agreed the rule as written did not require any further clarification.
8/11/2017	Jennifer Sommerfeld-Sager SAFE-CARE Program Manager Missouri KidsFirst	11 CSR 30-12.010	Payments for Sexual Assault Forensic Examinations	Unknown	Cap ER payment at \$540 and clinic payment at \$290.	The change referenced in this comment was included in the proposed amendment.
8/28/2017	Joy Oesterly, Executive Director Missouri KidsFirst	11 CSR 30-12.010	Payments for Sexual Assault Forensic Examinations	Unknown	The emergency room fee should be \$540 regardless of the provider. There are no additional costs to the institution if there is a difference in who is providing services.	The change referenced in this comment was included in the proposed amendment.
8/27/2017	Joy Oesterly, Executive Director Missouri KidsFirst	11 CSR 30-12.010	Payments for Sexual Assault Forensic Examinations	Unknown	The clinic fee should be \$290 regardless of who provides the services.	The change referenced in this comment was included in the proposed amendment.
8/28/2017	Kendra Eads, Executive Director Southeast Missouri Network Against Sexual Violence Joy Oesterly, Executive Director Missouri KidsFirst	11 CSR 30-12.010	Payments for Sexual Assault Forensic Examinations	Unknown	The rule needs to include a statement regarding timeline for submitting corrections to claims or appeals of denied claims. It is unreasonable to expect that a claim can be filed by the provider, reviewed by DPS and the provider submit corrections for an appeal within 90 days, especially when it may take 90 days or more for the claim to be processed by DPS. Recommend - Corrections to claims or appeal of denied claims must be filed within 90 days of DPS review and notification.	Under the current rule, the provider has 90 days from the date of exam to file a claim, if the claim is denied the provider will then have 45 days from the date on the notification letter to appeal the claim. DPS is not making any changes at this time, but strives to ensure that all victims of crime receive timely services.
8/28/2017	Kendra Eads, Executive Director Southeast Missouri Network Against Sexual Violence	11 CSR 30-12.010	Payments for Sexual Assault Forensic Examinations	Unknown	Rule currently reads, the “medical provider must ensure that all lines of the form are completely and legibly filled out.” However, when a representative of Children’s Division or law enforcement authorize the exam, authorization for the exam is not required by the victim/parent/guardian.	The wording has been clarified in the proposed amendment.

8/11/2017	Jennifer Sommerfeld-Sager, SAFE-CARE Program Manager, Missouri KidsFirst Kendra Eads, Executive Director Southeast Missouri Network Against Sexual Violence Joy Oesterly, Executive Director Missouri KidsFirst	11 CSR 30-12.020	Payments for Child Physical Abuse Forensic Examinations	Unknown	Omit "of the child physical abuse forensic examination." Case reviews can and are often done in the absence of a forensic examination.	The change referenced in this comment was included in the proposed amendment.
8/11/2017	Jennifer Sommerfeld-Sager, SAFE-CARE Program Manager, Missouri KidsFirst	11 CSR 30-12.020	Payments for Child Physical Abuse Forensic Examinations	Support	Change requirement to submit claim for case review "within 180 days of the forensic exam" to "within 90 days of completing the case review."	The change referenced in this comment was included in the proposed amendment.
8/11/2017	Jennifer Sommerfeld-Sager, SAFE-CARE Program Manager, Missouri KidsFirst	11 CSR 30-12.020	Payments for Child Physical Abuse Forensic Examinations	Support	Change wording regarding form needing to be "completely" filled out to account for the fact that only one authorization field need be completed. Add statement regarding timeline for submitting corrections or appeals.	The changes referenced in this comment were included in the proposed amendment.
8/11/2017	Jennifer Sommerfeld-Sager SAFE-CARE Program Manager Missouri KidsFirst	11 CSR 30-12.020	Payments for Child Physical Abuse Forensic Examinations	Support	Change wording regarding applicable signature of provider completing exam /case review.	The wording has been clarified in the proposed amendment.
8/31/2017	Joy Oesterly, Executive Director Missouri KidsFirst	11 CSR 30-12.020	Payments for Child Physical Abuse Forensic Examinations	Support	Rule currently reads " the SAFE-CARE must ensure that all fields of the claim form are completely and legibly filled out." However, when a representative of Children's Division or law enforcement authorize the exam, authorization for the exam is not required by the victim/parent/guardian.	The wording has been clarified in the proposed amendment.
8/11/2017	Jennifer Sommerfeld-Sager SAFE-CARE Program Manager Missouri KidsFirst Kendra Eads, Executive Director Southeast Missouri Network Against Sexual Violence Joy Oesterly, Executive Director Missouri KidsFirst	11 CSR 30-12.020	Payments for Child Physical Abuse Forensic Examinations	Support	ICD codes are not applicable to case reviews.	The change referenced in this comment was included in the proposed amendment.
8/27/2017	Kendra Eads, Executive Director Southeast Missouri Network Against Sexual Violence Joy Oesterly, Executive Director Missouri KidsFirst	11 CSR 30-12.020	Payments for Child Physical Abuse Forensic Examinations	Support	When a case review is done rather than an examination, consent or authorization is not required, only the signature of the SAFE-CARE provider doing the case review.	The wording has been clarified in the proposed amendment.

8/31/2017	Joy Oesterly, Executive Director Missouri KidsFirst	11 CSR 30-12.020	Payments for Child Physical Abuse Forensic Examinations	Support	Case reviews can be done in the absence of a forensic examination and with the adoption of RSMo 210.146, case reviews are often done in the absence of a forensic exam. We recommend changing the purpose statement from “providers who perform or provide a case review of a forensic examination” to “providers who perform or provide a case review of a forensic examination and a case review of a Children’s Division case file and/or any pertinent medical records/photographs”.	DPS incorporated "or provide a case review" into the purpose statement of the proposed amendment.
7/13/2017	Kevin Merritt	11 CSR 30-15.010	Format for Concealed Carry Permits	Unknown	Suggest adding an additional section to the existing rule to include extended and lifetime permits or to enact a separate rule covering the extended and lifetime permits.	Rescind because DPS has determined that this rule is no longer necessary due to the passage of SB 656 in 2016.
7/25/2017	Jimmy Bench	11 CSR 30-15.010	Format for Concealed Carry Permits	Support	Would like to see more planning and strengthening of this law.	Rescind because DPS has determined that this rule is no longer necessary due to the passage of SB 656 in 2016.
4/7/2017	Paul Fennewald	11 CSR 40-5.165	Elevator Mechanic	Oppose	Elevators are required to have annual inspection and a maintenance/test by a state licensed individual before the state will issue a yearly license. Regulations states the person who is doing the inspection cannot also do the maintenance/testing. A small country church has an elevator that is used 12-15 times a year. The regulation has increased the burden on this church from \$200 a year to approximately \$700 a year.	No revisions proposed. Missouri law (Sections 701.363 and 701.365) requires the Division of Fire Safety's Elevator Safety Program cause to be inspected and issue permits for all elevator equipment located in anything other than a single family residence. The Division cannot revise a rule to conflict with or supercede the underlying statutes. A statutory change would be required to allow the rule to be revised.
7/1/2017	MO Gaming Commission Staff	11 CSR 45-1.090	Definitions	Support	Add definition of key business entity so the definition applies to all chapters.	The change referenced in this comment was included in the proposed amendment. The proposed amendment was filed 4/26/18.
7/1/2017	MO Gaming Commission Staff	11 CSR 45-1.090	Definitions	Support	Correct definition of supplier to read "a person who sells or leases gaming equipment of supplies to any licensee, and".	The MO Gaming Commission (MGC) will amend to add definition of "key business entity" and change "gambling equipment" to "gaming equipment." Proposed amendment filed 4/26/18.
9/2/2017	Tiffini Cox, Product Compliance Mgr. Gaming Partners International	11 CSR 45-4.010	Licenses	Oppose	We are required to file a licensing application with MGC every two years using the most current version of the application. We propose that we may use the multi-jurisdictional and state specific rider in lieu of the designated MGC application.	MGC has reviewed this regulation. Although no action is being taken at this time the MGC will look at revising this rule.
9/5/2017	Tiffini Cox, Product Compliance Mgr. Gaming Partners International	11 CSR 45-4.020	Licenses, Restrictions on Licenses, Licensing Authority of the Executive Director, and Other Definitions	Support	We propose there is no 5% ownership rule requirement unless there is a single interest owner over 50% or it is a controlled company.	MGC has reviewed this regulation. Although no action is being taken at this time the MGC will look at revising this rule.
7/1/2017	MO Gaming Commission Staff	11 CSR 45-4.020	Licenses, Restrictions on Licenses, Licensing Authority of the Executive Director, and Other Definitions	Support	Remove the definition of key person/key business entity. This should be in Chapter 1 with other definitions.	MGC will amend to change terms regarding key persons and key business entities. Proposed amendment filed 4/26/18.
8/14/2017	David Kessel, Licensing Manager/Custodian of Records, MO Gaming Commission	11 CSR 45-4.085	Expiration of Temporary License	Oppose	Once a licensee's investigation is completed and goes before the commission for approval it is automatically made active. I'm not sure this rule is really needed.	MGC will rescind this rule because it is obsolete in that the Commission no longer issues temporary licenses. Proposed rescission filed 2/29/2018, Tentative effective date 10/30/2018.

7/1/2017	MO Gaming Association	11 CSR 45-4.200	Supplier's License	Support	Licensing requirements for independent directors should be removed, similar to other jurisdictions.	MGC has reviewed this regulation and is not proposing any revisions at this time.
7/1/2017	MO Gaming Association	11 CSR 45-4.200	Supplier's License	Support	The present licensing process in MO is overly burdensome and we believe the Commission should review licensing processes used in other gaming jurisdictions to look for ways to streamline its process.	MGC has reviewed this regulation. Although no action is being taken at this time the MGC will look at revising this rule.
7/1/2017	MO Gaming Association	11 CSR 45-4.200	Supplier's License	Support	Some suppliers avoid licensure in MO due to the licensing requirement for independent board members. This is adverse to our competitive environment.	MGC has reviewed this regulation. Although no action is being taken at this time the MGC will look at revising this rule.
7/1/2017	MO Gaming Association	11 CSR 45-4.200	Supplier's License	Oppose	Various regulations, including elaborate supplier licensing requirements, that prevent approval of many slot play mechanics and themes approved for use in the neighboring jurisdictions with which we must compete.	MGC has reviewed this regulation and is not proposing any revisions at this time.
8/14/2017	David Kessel, Licensing Manager/Custodian of Records MO Gaming Commission	11 CSR 45-4.210	Temporary Supplier's License	Support	I believe the rule should say "gambling supplies" not "gaming suppliers".	MGC will amend to correct references to the type of licensee referenced in sections (5) and (7) and corrects a misstated term. Proposed amendment filed 4/26/18.
7/1/2017	MO Gaming Commission Staff	11 CSR 45-4.260	Occupational Licenses for Class A, Class B, and Suppliers	Support	This rule only addresses occupational licensee, so the two references to "key business entity" should be removed from this section.	MGC will amend to eliminate language that is duplicated in another rule. Proposed amendment filed 4/26/18.
7/1/2017	MO Gaming Commission Staff	11 CSR 45-4.380	Occupational and Key Person/Key Business Entity License Application and Annual Fees	Support	This purpose of the rule should be revised to include suppliers because this rule also addresses key persons of suppliers.	MGC will amend to correct terminology for supplier license. Proposed amendment filed 4/26/18.
8/14/2017	David Kessel, Licensing Manager/Custodian of Records MO Gaming Commission	11 CSR 45-4.420	Occupational License	Support	This rule says "Upon issuance of an occupational license to applicant, applicant shall receive a partially completed occupational license badge from the commission." I'm not sure why it would say they receive a partially completed occupational license badge. It should just say applicant shall receive an occupational license badge.	MGC is in the process of drafting a proposed amendment.
7/1/2017	MO Gaming Association	11 CSR 45-5.051	Minimum Standards for Blackjack	Oppose	Allow table games management and surveillance to identify and remove advantage players from the casino rather than adjust game play and limits to mitigate the risk.	MGC has reviewed this regulation and is not proposing any revisions at this time.
7/14/2017	Linda Sohm, President/Treasurer, Midwest Game Supply Co.	11 CSR 45-5.053	Policies	Oppose	Recommend Gaming Commission assist licensees with performing due diligence. MGC has more investigative resources than small businesses.	MGC has reviewed and is not making any changes at this time.
7/1/2017	MO Gaming Commission Staff	11 CSR 45-5.065	Patrons Unlawfully on Excursion Gambling Boat - Not Eligible for Gambling Game Winnings	Support	Remove reference to 10.115 since it should be rescinded because the exclusion list is already addressed in Chapter 15.	MGC will amend to remove a reference to a rule that has been rescinded. Proposed amendment filed 4/26/18.
7/1/2017	MO Gaming Commission Staff	11 CSR 45-5.170	Destruction of Counterfeit Chips and Tokens	Support	Remove (3) because it does not have anything to do with the counterfeits.	MGC will amend to remove obsolete and unduly burdensome provisions, and the information being deleted is not necessary for the commission to fulfill its duties. Proposed filed 2/29/2018, Tentative effective date 10/30/2018.

7/1/2017	MO Gaming Commission Staff	11 CSR 45-5.170	Destruction of Counterfeit Chips and Tokens	Support	Remove (4) (B-D). This is additional information that is not necessary. As long as the number and denomination information is recorded that should be sufficient.	MGC will amend to remove obsolete and unduly burdensome language and correct incorrect designation of licensee subject to this rule. Delete section (3) and subsections (4)(B), (C), and (D), and correct language in renumbered section (4) Proposed filed 2/29/2018, Tentative effective date 10/30/2018.
7/1/2017	MO Gaming Association	11 CSR 45-5.181	Promotional Activities	Oppose	The rules should be modified to make clear that facilities shall be disciplined only in circumstances in which promotion rules are intentionally not followed or promotions are intentionally misleading. In addition, if no intentional harm results to patrons, there should be no discipline unless there is a failure to make a good faith effort to follow published rules.	This rule protects patrons by ensuring they receive the advertised benefits from promotions. The provisions of this rule are similar to other consumer protection laws. No provisions are being proposed at this time.
7/1/2017	MO Gaming Association	11 CSR 45-5.181	Promotional Activities	Support	Due to the severe restrictions in the promotional rule it should be revised to allow a company more flexibility in its promotions. The definition of promotional activity is overly broad and should not include non-gaming amenities such as food, concerts and other items.	MGC will amend to remove requirement for legal affidavit for promotions and provides an exception to the rule for activities exclusively related to food, concerts, hotels and other non-gaming establishments. Proposed amendment filed 4/26/18.
7/1/2017	MO Gaming Association	11 CSR 45-5.181	Promotional Activities	Support	Requirement for promotional activities to be approved before being put into use is overly restrictive and prohibits a company from adjusting its promotional activities quickly.	MGC will amend to remove requirement for legal affidavit for promotions and provides an exception to the rule for activities exclusively related to food, concerts, hotels and other non-gaming establishments. Proposed amendment filed 4/26/18.
7/1/2017	MO Gaming Association	11 CSR 45-5.181	Promotional Activities	Oppose	Modify to the same restriction as a slot play. This would result in reduced time to process coupons.	This regulation does not address processing coupons; therefore, it is not clear how removing this information would affect the time needed to process coupons.
7/1/2017	MO Gaming Association	11 CSR 45-5.184	Table Game Cards - Receipt, Storage, Inspections and Removal from Use	Oppose	We suggest this provision be removed or modified. Cards should not have to be checked with a deck checker at the game where they will be played. A property should be allowed to use one deck checker at the pit stand and transfer the cards to the game.	MGC will amend to allow all decks to be inspected at an alternate table. Proposed amendment filed 4/26/18.
7/1/2017	MO Gaming Association	11 CSR 45-5.184	Table Game Cards - Receipt, Storage, Inspections and Removal from Use	Support	Reduce restrictions on the use of pre-shuffled cards and allow their use in more games. Allow these procedures on 6 deck games, not just one time use games.	MGC will revise this rule. Proposed amendment filed 4/26/18.
7/1/2017	MO Gaming Association	11 CSR 45-5.184	Table Game Cards - Receipt, Storage, Inspections and Removal from Use	Oppose	Since these cards are pre-inspected there is no need for another inspection to be required.	MGC will amend to allow all decks to be inspected at an alternate table. Proposed amendment filed 4/26/18.
7/1/2017	MO Gaming Association	11 CSR 45-5.184	Table Game Cards - Receipt, Storage, Inspections and Removal from Use	Oppose	Allow playing cards to be preinspected at any location in the casino Pit including the podium. Adequate surveillance coverage is available and by allowing this practice it would not interrupt the guest at the tables.	MGC will amend to allow all decks to be inspected at an alternate table. Proposed amendment filed 4/26/18.
7/1/2017	MO Gaming Association	11 CSR 45-5.184	Table Game Cards - Receipt, Storage, Inspections and Removal from Use	Oppose	Proper daily inventory is already being done making this provision duplicative.	MGC will amend to allow all decks to be inspected at an alternate table. Proposed amendment filed 4/26/18.

8/30/2017	Stan Triplett, Regional Manager IGT	11 CSR 45-5.190	Minimum Standards for Electronic Gaming Devices	Oppose	Requires that gaming devices that may be affected by player skill must meet the minimum payout percentage requirement even when the skill of the player provides the lowest possible return to the player from the skill portion of the game. We seek consideration to broaden the method in which the minimum payout percentage requirement is calculated rather than based on the lowest skilled player with the suggested language deletion: "11 CSR 45-5.190 (2) Electronic gaming devices that may be affected by player skill must meet the minimum payout percentage requirement. even when the skill of the player provides the lowest possible return to the player from the skill portion of the game."	MGC has reviewed this regulation. Although no action is being taken at this time the MGC will look at revising this rule.
8/30/2017	Stan Triplett, Regional Manager IGT	11 CSR 45-5.190	Minimum Standards for Electronic Gaming Devices	Support	Defines the probability of obtaining the maximum payout on any Electronic Gaming Device (EGD) shall not be less than one (1) in fifty (50) million. IGT suggests consideration for allowing higher maximum payout odds when outlined to the player with the following language change: "11 CSR 45-5.190 (3) The probability of obtaining the maximum payout on any electronic gaming device shall not be less than one (1) in fifty (50) million unless otherwise denoted to the player."	MGC has reviewed this regulation. Although no action is being taken at this time the MGC will look at revising this rule.
8/30/2017	Stan Triplett, Regional Manager IGT	11 CSR 45-5.190	Minimum Standards for Electronic Gaming Devices	Support	Requires that an EGD shall be controlled by a microprocessor or the equivalent in such a manner that the game outcome is completely controlled by the microprocessor or equivalent device as approved by the commission. We observe in the case of an EGD that includes a skill based game play mechanic that the player may have an impact on the game outcome based on their skill.	MGC has reviewed this regulation. Although no action is being taken at this time the MGC will look at revising this rule.
8/30/2017	Stan Triplett, Regional Manager IGT	11 CSR 45-5.190	Minimum Standards for Electronic Gaming Devices	Support	Requires games to have a random selection process that must not produce detectable patterns of game elements or detectable dependency upon any previous game outcome, the amount wagered, or style or method of play. There have been several games designed with some of these game play mechanics which are fully specified in the game rules to provide advance awareness. We seek consideration to expand the games offered by the following language change: "11 CSR 45-5.190(4)(H) Unless otherwise specified by game rules, have a random selection process that must not produce detectable patterns of game elements or detectable dependency upon any previous game outcome, the amount wagered, or upon the style or method of play;"	MGC has reviewed this regulation. Although no action is being taken at this time the MGC will look at revising this rule.

8/30/2017	Stan Triplett, Regional Manager IGT	11 CSR 45-5.190	Minimum Standards for Electronic Gaming Devices	Support	Defines that each game has available for random selection at the initiation of each play, each possible permutation or combination of game elements which produce winning or losing game outcomes. IGT suggests consideration to align to industry standards with the following language which relies on informing the player in advance of making the decision to place a wager: "11 CSR 45-5.190(4)(L) Have available for random selection at the initiation of each play, each possible permutation or combination of game elements which produce winning or losing game outcomes, unless otherwise denoted by the game; and"	MGC has reviewed this regulation. Although no action is being taken at this time the MGC will look at revising this rule.
8/30/2017	Stan Triplett, Regional Manager IGT	11 CSR 45-5.193	Statistical Performance of Electronic Gaming Devices	Support	Defines the formula for calculating the standard deviation along with the definitions of the respective equation terms. IGT suggests consideration to extend the usage of NetPayi to the following in order to include a mathematically representative value of the players experience: "NetPayi = (the amount of each individual pay divided by the number of coins wagered) or (the total win amount of one wagered game, including all the wins in a bonus round, divided by the number of coins wagered). "	MGC has reviewed this regulation. Although no action is being taken at this time the MGC will look at revising this rule.
7/1/2017	MO Gaming Association	11 CSR 45-5.200	Progressive Slot Machines	Oppose	Remove from the regulation defining a minimum weekly reconciliation for non-exempt machines. This requirement is excessive. Monthly could work.	MGC has reviewed this regulation. Although no action is being taken at this time the MGC will look at revising this rule.
8/30/2017	Stan Triplett, Regional Manager IGT	11 CSR 45-5.200	Progressive Slot Machines	Oppose	Defines the wide-area progressive as a system of gambling games with a progressive jackpot linked across a communication network approved by the commission which connects separate gaming establishments licensed or approved by the commission. IGT suggests consideration for the ability to extend the gaming establishments allowed on a Wide-area progressive link to other jurisdictions that allow multi-jurisdiction operation (e.g., Nevada, New Jersey).	MGC has reviewed this regulation. Although no action is being taken at this time the MGC will look at revising this rule.

8/30/2017	Stan Triplett, Regional Manager IGT	11 CSR 45-5.200	Progressive Slot Machines	Support	Requires that the licensee authorized to provide a wide-area progressive system maintain in a restricted account a reserve consisting of cash, United States Government Treasury Securities, United States Government Agency Securities and/or Missouri state debt instruments of not less than the sum of the amounts noted in 1. – 2. Based on MGC's recent acceptance to allow IGT to utilize surety bonds as an approved method, IGT suggests the following language change for consideration: "11 CSR 45-5.200 (14)(A) Maintain in a restricted account a reserve consisting of cash, United States Government Treasury Securities, United States Government Agency Securities, and/or Missouri State debt instruments or via alternate methods as approved by the Commission of not less than the sum of the following amounts."	MGC has reviewed this regulation. Although no action is being taken at this time the MGC will look at revising this rule.
8/30/2017	Stan Triplett, Regional Manager IGT	11 CSR 45-5.200	Progressive Slot Machines	Support	Defines the term progressive jackpot to mean a payout that increases over time solely as a function of the amount of wagers played. This definition precludes games that increment awards based on means other than a function of the amount wagered. An example includes incrementing an award when a specific symbol or combination is part of the game outcome within the game not tied to an external bonus system. IGT suggests consideration of the following language change to allow Missouri operators to utilize new game play mechanics: "11 CSR 45-1.090 (J) Progressive jackpot – A payout that increases over time solely as a function of the amount of wagers played or game events."	MGC has reviewed this regulation. Although no action is being taken at this time the MGC will look at revising this rule.
7/1/2017	MO Gaming Association	11 CSR 45-5.210	Integrity of Electronic Gaming Devices	Oppose	Change reg to allow employees to break seals with proper notification. This is allowed in other markets.	MGC has reviewed this regulation and is not proposing any revisions at this time.
7/1/2017	MO Gaming Association	11 CSR 45-5.210	Integrity of Electronic Gaming Devices	Oppose	EGD tamper proof seals – Remove the requirement of seals on the CPU and software allowing slot tech staff to work on machines to perform preventative maintenance and troubleshoot without MGC assistance. Adopt an audit process similar to other jurisdictions without seals. If seals must remain, we suggest removing the requirement to verify (GAT) software for jackpots \$50k or more if the seal is intact.	MGC has reviewed this regulation and is not proposing any revisions at this time.
9/2/2017	Tiffini Cox, Product Compliance Manager, Gaming Partners International	11 CSR 45-5.237	Shipping of Electronic Gaming Devices, Gaming Equipment or Supplies	Support	We propose that there is no shipping approval requirement for our products. Our request is to provide a courtesy shipping notice to gaming prior to shipment.	MGC has reviewed this regulation. Although no action is being taken at this time the MGC will look at revising this rule.
7/1/2017	MO Gaming Commission Staff	11 CSR 45-5.237	Shipping of Electronic Gaming Devices, Gaming Equipment or Supplies	Oppose	Change "at least (5) days" to "at least (5) business days"	MGC has reviewed this regulation. Although no action is being taken at this time the MGC will look at revising this rule.

7/1/2017	MO Gaming Commission Staff	11 CSR 45-5.237	Shipping of Electronic Gaming Devices, Gaming Equipment or Supplies	Support	Suggest that we add the information required on a shipping request and not mention a form that has not been incorporated correctly. It is preferable to require the information be submitted and not mention a specific form.	MGC has reviewed this regulation. Although no action is being taken at this time the MGC will look at revising this rule.
7/1/2017	MO Gaming Association	11 CSR 45-5.400	Junket, Junket Enterprises, Junket Representatives - Definitions	Support	Junkets - We suggest removal of these regulations. These arrangements are a business decision of the property and should be left to them to decide based on contracts between the parties.	MGC will rescind this rule because it is unnecessary to protect the integrity of gaming in Missouri. Proposed rescission filed 12/7/2017, effective 7/31/2018.
7/1/2017	MO Gaming Association	11 CSR 45-6.020	Safety Standards	Support	ABS Inspection Requirements - These are rules that have outlived their original purpose and should be significantly rewritten. A costly example of such a rule is the continuing requirement for third party examiners (11 - CSR 45.6.020). In gaming's inception, the American Bureau of Shipping (ABS) provided a public safety inspection of facilities floating on the river. Since, most of the gaming facilities are no longer located upon the Missouri River or the Mississippi River the focus and regularity of these inspections should be restructured.	MGC will amend this rule to change the definition for certificate of inspection, provides for compliance with local, state and federal building and fire codes, and deletes references to the United States Coast Guard standards and inspections. Proposed amendment filed 4/26/18.
7/1/2017	MO Gaming Commission Staff	11 CSR 45-7.020	Minimum Standards	Support	Remove second sentence. The CSR should not be more restrictive than the statute, according to rulemaking procedures.	MGC will amend this rule to remove unnecessary language about surveillance systems. Proposed filed 2/29/2018, Tentative effective date 10/30/2018.
7/1/2017	MO Gaming Association	11 CSR 45-7.030	Required Surveillance Equipment	Support	Allow the use of wireless camera systems outdoors - more cost effective to monitor outdoor areas with wireless solutions. Trench digging fiber optic and the equipment necessary to run fiber are cost prohibitive. These newer systems were not available at the time these regulations were originally drafted.	MGC is continuing to review this rule and may consider making revisions. Regulations will need to be developed to ensure the wireless cameras are secured and do not allow access to the closed circuit system.
7/1/2017	MO Gaming Commission Staff	11 CSR 45-7.150	Compliance with this Chapter	Support	Change Class A licensee to Class B licensee, since this hasn't been updated to reflect the change in the licensing names.	MGC will amend this rule to correct Class A licensee to Class B licensee. Proposed amendment filed 2/29/2018, Tentative effective date 10/30/2018.
7/1/2017	MO Gaming Commission Staff	11 CSR 45-7.150	Compliance with this Chapter	Support	Delete section 3 - the language is unnecessary.	MGC will amend this rule to delete section (3) as the language is unnecessary. Proposed amendment filed 2/29/2018, Tentative effective date 10/30/2018.
7/1/2017	MO Gaming Association	11 CSR 45-7.160	Emergency Medical Services (EMS) First Responder Required	Support	Emergency Medical Services (EMS) Requirements - We suggest rescinding the regulation in its entirety. This regulation had merit when excursion gambling facilities cruised but that has not been the case for years. By rescinding the regulation our properties will be treated the same and handle these situations in similar fashion as other businesses operating in the state.	MGC will amend to reduce the requirement from certified training to basic life support training for emergency medical response staff. Proposed amendment filed 4/26/18.
7/1/2017	MO Gaming Commission Staff	11 CSR 45-8.050	Standard Financial and Statistical Reports	Support	Remove first sentence in (2) since the commission does not do this.	MGC will amend section (2) to delete the requirement for the Commission to periodically prescribe and send licensees a set of standard reporting forms and instructions to be used in filing monthly, quarterly and annual reports. Proposed amendment filed 4/26/18.

7/1/2017	MO Gaming Association	11 CSR 45-8.060	Audits	Oppose	We suggest this provision be rescinded. This particular regulation is redundant in that MGC performs an audit of AGR and requiring an external audit is unnecessary.	The external audit is required by section 313.825, RSMo.
7/1/2017	MO Gaming Commission Staff	11 CSR 45-8.060	Audits	Support	Reduce the number of copies or allowing electronic copies.	MGC will amend this rule to change requirement from four (4) hard copies to one (1) hard copy or an electronic copy for audit reports. Proposed amendment filed 4/26/18.
7/1/2017	MO Gaming Commission Staff	11 CSR 45-8.070	Forms, Records and Documents	Oppose	Update rule, since not all copies are color coded.	MGC has reviewed this regulation and is not proposing any revisions at this time.
7/1/2017	MO Gaming Commission Staff	11 CSR 45-8.090	Mandatory Count Procedure	Support	Add language to section (1) to allow for emergency drops with notice to gaming.	MGC will amend Section (1) to provide for an emergency removal of funds. Proposed amendment filed 4/26/18.
7/1/2017	MO Gaming Commission Staff	11 CSR 45-8.090	Mandatory Count Procedure	Support	Delete (2). This was an original rule when gaming started and has not resulted in any benefit to the commission as far as identifying potential thefts or collusion between employees.	MGC will amend Section (2) to eliminate some of the requirements for court personnel. Proposed amendment filed 4/26/18.
7/1/2017	MO Gaming Commission Staff	11 CSR 45-8.100	Count Room - Characteristics	Support	Remove the first sentence in (3) since this is addressed in the MICS, Chapter B rules.	MGC will amend to remove language duplicative of and conflicting with provisions in 11 CSR 45-9.102. Proposed amendment filed 2/29/2018, Tentative effective date 10/30/2018.
7/1/2017	MO Gaming Association	11 CSR 45-8.130	Tips and Gifts	Unknown	Tips and Gifts - Allow for casino housekeeping and EVS to be able to accept tips. Casino housekeeping and EVS staff provide services for guests which many patrons would like to compensate them for. Housekeeping and EVS are two of the only positions that work front line that can't accept tips. The property should have the ability to determine which of its staff should be able to accept tips.	MGC will amend to add housekeeping and environmental services (EVS) persons to employees who may receive tips. Proposed amendment filed 4/26/18.
7/1/2017	MO Gaming Association	11 CSR 45-8.130	Tips and Gifts	Unknown	Eliminate regulation on how team members collect and account tips. Token committees should be allowed to determine all methods. Would like to allow dealers the option to have soft count perform the token count, allow slot tokens to be counted in recycler room, remove the requirement of Accounting presence while tokens are counted and other unnecessary requirements.	MGC will amend to add housekeeping and environmental services (EVS) persons to employees who may receive tips and removes procedures for counting pooled tips. Proposed amendment filed 4/26/18.
7/1/2017	MO Gaming Association	11 CSR 45-8.130	Tips and Gifts	Oppose	Eliminate accounting from being part of this process. Counts have Surveillance coverage and final counts are immediately transferred to the Main Bank and independently verified by Main Bank personnel.	MGC will amend to add housekeeping and environmental services (EVS) persons to employees who may receive tips and removes procedures for counting pooled tips. Proposed amendment filed 4/26/18.
7/1/2017	MO Gaming Commission Staff	11 CSR 45-8.140	Application and Verification Procedures for Granting Credit	Unknown	Some standards in MICS, Chapter H are duplicated in sections 8.140, 8.141 and 8.142. This should only be addressed in one location.	MGC has reviewed this regulation and is not proposing any revisions at this time.
7/1/2017	MO Gaming Commission Staff	11 CSR 45-8.150	Cash Reserve Requirements	Support	Remove appendix language and make the appendix part of the rule.	MGC will amend this rule to remove reference to Appendix A. Proposed amendment filed 4/26/18.

7/1/2017	MO Gaming Commission Staff	11 CSR 45-9.010	Definition of Licensee	Support	Delete "affiliate supplier," since it no longer exists.	MGC will amend to remove unnecessary language from section (1) because the commission does not license affiliate suppliers, in that all entities meeting the statutory definition are issued suppliers licenses. Proposed amendment filed 2/29/2018, Tentative effective date 10/30/2018.
7/1/2017	MO Gaming Association	11 CSR 45-9.101	Minimum Internal Control Standards (MICS) - Chapter A General and Administrative	Oppose	Allow there to be one badge for dual rates or interns, so they do not have to switch badges each time they switch positions.	These positions are licensed and need to display the appropriate badge when performing their duties for everyone to know what their function is at that time.
7/1/2017	MO Gaming Association	11 CSR 45-9.101	Minimum Internal Control Standards (MICS) - Chapter A General and Administrative	Oppose	Ability to allow ticketing employees to dual rate into a higher position would provide growth and development opportunities for these employees.	Ticketing employees were not allowed to dual rate in order to restrict the number of employees who have access to reset patrons' pins. This offers some protection from patrons' points or free play being misappropriated by employees.
7/1/2017	MO Gaming Association	11 CSR 45-9.101	Minimum Internal Control Standards (MICS) - Chapter A General and Administrative	Oppose	Pit access restrictions defined by MGC staff. We suggest this be modified to allow each property to determine which positions have pit access for non-table personnel.	This regulation does not define who has access to the pits.
7/1/2017	MO Gaming Commission Staff	11 CSR 45-9.101	Minimum Internal Control Standards (MICS) - Chapter A General and Administrative	Support	MICS, Chapter A 1.04 requires MGC approval to allow an employee assigned to a position to dual position into another position in a different department if either position requires an occupational license. I think this rule should be revised to only require them to submit a request if either position is a gaming position (Security, Surveillance, Slots, Tables, Poker, Accounting, Ticketing, Cage, Count, Internal Audit, Compliance, Marketing, and maybe HR). I don't think they should be required to submit a request to allow a F & B employee to dual position as an F & B employee in a different venue or some other non-gaming department.	MGC has reviewed and is not making any changes at this time.
7/1/2017	MO Gaming Association	11 CSR 45-9.101	Minimum Internal Control Standards (MICS) - Chapter A General and Administrative	Support	Dual Rating - Limitations on dual rating curtail the potential development and opportunities for employees to gain knowledge and experience as they strive to further their career and increase their pay rate in each department. This is especially impactful to the smaller departments. The 33% limitation is also a factor when scheduling to cover the operational needs of the business for vacations and call outs. We suggest eliminating this regulation and allowing this to be a business decision made by the property. Doing so would allow the casino to more effectively schedule and utilize present staff based on fluctuating business demands.	MGC will amend to change the internal controls for Chapter A of the Minimum Internal Control Standards by removing the thirty three percent (33%) limitation for dual-rate employees and remove the requirement for the Class B licensees to obtain commission approval to allow certain job positions to dual position. Proposed amendment filed 4/26/18.

7/1/2017	MO Gaming Association	11 CSR 45-9.101	Minimum Internal Control Standards (MICS) - Chapter A General and Administrative	Support	Modify - See above A: 1.02 B.	Ticketing employees were not allowed to dual rate in order to restrict the number of employees who have access to reset patrons' pins. This offers some protection from patrons' points or free play being misappropriated by employees.
7/1/2017	MO Gaming Association	11 CSR 45-9.102	Minimum Internal Control Standards (MICS) - Chapter B Key Controls	Support	The Commission has imposed rekey of a code due to a key being taken from the floor. We believe mitigating circumstances should be taken into consideration in these situations. When it can be shown the keys have not been compromised, the property should not have to recode all keys. There is considerable time and expense to do this and if it is not necessary, the property shouldn't be required to make the changes.	MGC will look into modifying this rule to state "unless the Commission in its sole discretion, deems this is not necessary."
7/1/2017	MO Gaming Association	11 CSR 45-9.102	Minimum Internal Control Standards (MICS) - Chapter B Key Controls	Oppose	The list of job titles which must be listed. Rather than providing a detailed listing all job titles allow the company to submit the lowest level position to be listed and all above in the reporting structure would be allowed.	MGC disagrees. Key access should only be permitted if key access is consistent with their job title and duties.
7/1/2017	MO Gaming Association	11 CSR 45-9.102	Minimum Internal Control Standards (MICS) - Chapter B Key Controls	Support	Remove requirement for the lead to obtain control of passed key for the door to open. There could be situations which arise where this isn't practical and the property should have flexibly during such times without concern for being disciplined.	MGC will delete the last sentence of the rule. Security at the conclusion of the count is required to verify that all keys have been returned to the box.
7/1/2017	MO Gaming Association	11 CSR 45-9.102	Minimum Internal Control Standards (MICS) - Chapter B Key Controls	Oppose	We believe the property should have the flexibility to define and grant access to sensitive areas in the case of an emergency.	MGC has reviewed this comment and is not making changes at this time. The Boat Sergeant can always grant a variance in case of an emergency.
7/1/2017	MO Gaming Association	11 CSR 45-9.104	Minimum Internal Control Standards (MICS) - Chapter D Table Games(Live Games	Support	Can the security simply represent that they are transporting and not verifying the value?	MGC will revise the rule to clarify that security can sign as the transporter and not have to verify the amount of the fill.
7/1/2017	MO Gaming Association	11 CSR 45-9.104	Minimum Internal Control Standards (MICS) - Chapter D Table Games(Live Games	Oppose	Remove requirement for having a pit manager. Allow a pit manager to be responsible for more games on the floor. Other gaming jurisdictions uses Assistant Managers and Shift Managers.	MGC is continuing to review the rule to determine if there are any changes needed.
7/1/2017	MO Gaming Association	11 CSR 45-9.104	Minimum Internal Control Standards (MICS) - Chapter D Table Games(Live Games	Oppose	Remove the 90% requirement for pit managers to be in the pit area. Pit Managers are required to take care of documentation, one on ones and other issues that require privacy away from pit personnel and the public. This could require them to be out of the pit during these times. The property should determine how often and when a pit manager is required in the pit.	MGC is continuing to review the rule to determine if there are any changes needed.
7/1/2017	MO Gaming Association	11 CSR 45-9.104	Minimum Internal Control Standards (MICS) - Chapter D Table Games(Live Games	Oppose	We believe the current regulations are excessive and the Commission should consider adopting the Nevada standard.	MGC is continuing to review the rule to determine if there are any changes needed.
7/1/2017	MO Gaming Association	11 CSR 45-9.104	Minimum Internal Control Standards (MICS) - Chapter D Table Games(Live Games	Unknown	Table fills must be signed by cage in the presence of security prior to being signed by security. Can this signature process be simplified by ensuring the signatures exist on the form?	MGC agrees that the cashier does not need to sign in the presence of Security. MGC will revise the rule to clarify.

7/1/2017	MO Gaming Association	11 CSR 45-9.104	Minimum Internal Control Standards (MICS) - Chapter D Table Games(Live Games	Unknown	Match Play and Free Bet Coupon should be treated the same and placed in the circle during wager.	MGC disagrees. This allows surveillance the ability to clearly determine what is being wagered and if the wager was paid correctly.
7/1/2017	MO Gaming Association	11 CSR 45-9.104	Minimum Internal Control Standards (MICS) - Chapter D Table Games(Live Games	Oppose	Redeemed coupons are secure throughout the process and not subject to compromise therefore we believe this is excessive.	MGC disagrees. Coupons are not secured throughout the process as they are handled by many employees throughout the process and external auditors. Without cancelation these coupons are subject to compromise. Recording the date redeemed aids in proper reporting of taxes.
7/1/2017	MO Gaming Association	11 CSR 45-9.104	Minimum Internal Control Standards (MICS) - Chapter D Table Games(Live Games	Oppose	This provision sets out the number of table games supervisors which are required. We feel this micromanages the business operations of the property and should be removed. The property should determine how many games a supervisor can monitor based on their risk tolerance.	MGC is continuing to review the rule to determine if there are any changes needed.
7/1/2017	MO Gaming Association	11 CSR 45-9.104	Minimum Internal Control Standards (MICS) - Chapter D Table Games(Live Games	Oppose	This provision prevents a property from determining what the property believes is sufficient staffing. Provision should be removed or modified to allow for more tables to be supervised. At a minimum, the number of tables should be increased.	MGC is continuing to review the rule to determine if there are any changes needed.
7/2/2017	MO Gaming Association	11 CSR 45-9.104	Minimum Internal Control Standards (MICS) - Chapter D Table Games(Live Games	Oppose	If unable to remove, modify to "When a pit manager is required, the pit manager should be solely dedicated to supervising activities at open table games and activities within the pit."	MGC is continuing to review the rule to determine if there are any changes needed.
7/1/2017	MO Gaming Association	11 CSR 45-9.104	Minimum Internal Control Standards (MICS) - Chapter D Table Games(Live Games	Support	We believe this language is excessive and suggest it be removed. Remove "when verifying a player's wager, the amount of chips shall be proven for Surveillance."	MGC agrees. MGC will revise this rule and remove "when verifying a player's wager."
7/1/2017	MO Gaming Association	11 CSR 45-9.104	Minimum Internal Control Standards (MICS) - Chapter D Table Games(Live Games	Support	We believe the requirement to obtain MGC approval every time a shuffler needs to be moved is excessive and should be removed.	MGC agrees. MGC will rescind this rule due to this is already addressed in 45-7.120 (3).
7/1/2017	MO Gaming Association	11 CSR 45-9.104	Minimum Internal Control Standards (MICS) - Chapter D Table Games(Live Games	Oppose	In other markets, machine can be passed off without being closed. Would like to see Missouri adopt a similar regulation.	This will take time to review the rule and to determine if there are any changes we need to make.
7/1/2017	MO Gaming Association	11 CSR 45-9.104	Minimum Internal Control Standards (MICS) - Chapter D Table Games(Live Games	Oppose	In other markets, employees can break seals with gaming notification. We believe the regulation should be modified to allow the property to call or break the seal in those instance Commission representatives are not readily available. Delays when waiting on MGC to arrive prevents the operator from repairing the machine immediately.	MGC disagrees. The security seal is used to ensure the logic area has not been tampered with after software validation has been performed. Having an MGC representative there to break the tape also verifies the CPU's integrity. Security seals are essential to the integrity of gaming in the state of Missouri.
7/1/2017	MO Gaming Association	11 CSR 45-9.104	Minimum Internal Control Standards (MICS) - Chapter D Table Games(Live Games	Support	We believe the requirements in 2.04 are overly prescriptive and restrictive. Suggestions for modification include removing requirement to have a 2nd person act as verifier on jackpots less than \$1200.	This will take time to review the rule and to determine if there are any changes we need to make. MGC will consider taking out the witness/verifier for jackpots less than \$1200.
7/1/2017	MO Gaming Association	11 CSR 45-9.104	Minimum Internal Control Standards (MICS) - Chapter D Table Games(Live Games	Oppose	Modifying escort requirement to only be required for jackpots over \$15,000.	MGC disagrees. MGC feels this is important for patron protection and prevent crime in the casino.

7/1/2017	MO Gaming Association	11 CSR 45-9.104	Minimum Internal Control Standards (MICS) - Chapter D Table Games(Live Games	Oppose	Allow two different employees to verify the jackpot process. One employee for the verification of the jackpot on the EGD and one employee to verify the funds paid to the patron. Excessive burden on casino to have employee who witnessed the jackpot on the EGD wait until the funds are prepared and paid. This process should be split in two transactions.	MGC is continuing to review the rule to determine if there are any changes needed.
7/2/2017	MO Gaming Association	11 CSR 45-9.104	Minimum Internal Control Standards (MICS) - Chapter D Table Games(Live Games	Oppose	We suggest removing the requirement for a security escort (with surveillance coverage). Current escort requirement is \$5,000. Would like to allow jackpots under \$15,000 to leave the cage without security escort.	MGC disagrees. MGC feels this is important for patron protection and prevent crime in the casino.
7/1/2017	MO Gaming Association	11 CSR 45-9.104	Minimum Internal Control Standards (MICS) - Chapter D Table Games(Live Games	Oppose	Remove the requirement for an independent verifier for jackpot payouts of \$15,000 plus.	MGC disagrees. Verifiers are necessary for all jackpots over \$1200 to prevent fraud/theft by employees. Independent verifiers on jackpots \$15,000 and higher are an extra layer of security against theft on larger jackpots to prevent collusion/fraud/theft by employees. Requiring the verifier to be independent helps avoid collusion between co-workers in the same department.
7/1/2017	MO Gaming Association	11 CSR 45-9.104	Minimum Internal Control Standards (MICS) - Chapter D Table Games(Live Games	Oppose	Remove or modify the language to allow the person verifying the jackpot receipt and the jackpot payout to be different people. The Slot Attendant who verified the initial jackpot and reel combination should not have to be the same one that needs to verify the payout. These are two separate events and having to wait for the same verifier, when they could be busy helping another guest or processing another jackpot, causes a lengthy undo wait for the guest and is a burden to the team members. While the initial Slot Attendant is waiting for that verifier, they could have been finished and out helping other guests. When it takes longer than average to pay a jackpot, it can impact employee services or cause overtime if jackpot hits at the end of an employee's shift.	MGC is continuing to review the rule to determine if there are any changes needed.
7/1/2017	MO Gaming Association	11 CSR 45-9.104	Minimum Internal Control Standards (MICS) - Chapter D Table Games(Live Games	Oppose	Allow IDs that are current and have been scanned into optical image available for gaming/casino personnel to access.	MGC has reviewed this regulation and decided not to propose any revisions at this time.
7/1/2017	MO Gaming Association	11 CSR 45-9.104	Minimum Internal Control Standards (MICS) - Chapter D Table Games(Live Games	Oppose	We believe this provision should be removed or the present threshold increased to at least \$100.	MGC has reviewed this regulation and decided not to propose any revisions at this time.

7/1/2017	MO Gaming Association	11 CSR 45-9.104	Minimum Internal Control Standards (MICS) - Chapter D Table Games(Live Games	Oppose	We believe the five-day notice and prior approval requirement should be removed as it hinders a property's ability to install move or relocate a machine. A property should be able to notify when it wants to move games so locations can be tracked. However, prior notice and approval is not necessary and makes conducting business more difficult. Casinos should be able to move existing and approved games to any location on the casino floor based on business needs without approval.	MGC has reviewed this regulation and decided not to propose any revisions at this time.
7/1/2017	MO Gaming Association	11 CSR 45-9.104	Minimum Internal Control Standards (MICS) - Chapter D Table Games(Live Games	Oppose	We suggest this be rescinded. Other markets allow games to be moved without a drop if asset number is remaining the same. We believe Missouri should adopt a similar provision.	MGC has reviewed this regulation and decided not to propose any revisions at this time.
7/1/2017	MO Gaming Association	11 CSR 45-9.104	Minimum Internal Control Standards (MICS) - Chapter D Table Games(Live Games	Oppose	This requirement should be rescinded. In other markets, RAM clear slips are not required. Review done by MGC a few years ago showed very limited use of these slips for audits. We believe this should be an option and not a requirement. A property can go to considerable time and expense to comply with the regulation but have no value to them.	MGC is continuing to review the rule to determine if there are any changes needed.
7/1/2017	MO Gaming Association	11 CSR 45-9.104	Minimum Internal Control Standards (MICS) - Chapter D Table Games(Live Games	Oppose	This should be removed. In other markets, this testing is not required following a RAM clear.	MGC has reviewed this regulation and decided not to propose any revisions at this time.
7/1/2017	MO Gaming Association	11 CSR 45-9.104	Minimum Internal Control Standards (MICS) - Chapter D Table Games(Live Games	Support	TITO retention of 30 days and one year is extreme and unnecessary. Tickets may be disposed of once the audit is complete. There has never been any occasion where a TITO was researched after any length of time. If there is a variance, it is investigated immediately. Having to store TITOs up to one year is costly with warehouse space and containers.	MGC agrees. MGC will look at reducing the retention of tickets.
7/1/2017	MO Gaming Association	11 CSR 45-9.104	Minimum Internal Control Standards (MICS) - Chapter D Table Games(Live Games	Support	We suggest removing the security requirement for unsecured fund transportation. We believe this requirement is excessive and should be changed to require a notification of surveillance only.	MGC agrees. MGC will look at raising the amount that requires a security escort.
7/1/2017	MO Gaming Association	11 CSR 45-9.105	Minimum Internal Control Standards (MICS) - Chapter E Electronic Gaming Devices	Support	In other markets, a machine can be passed off without being closed. Missouri should adopt a similar regulation.	MGC is continuing to review the rule to determine if there are any changes needed.
7/2/2017	MO Gaming Association	11 CSR 45-9.106	Minimum Internal Control Standards (MICS) - Chapter F Poker Room	Oppose	Modify - Tournament payout should be allowed at the Poker Room Bank. Other casinos payout tournaments in the room and often on the table. We believe tournament payouts should be allowed in the room as it is more convenient for our patrons.	MGC is continuing to review the rule to determine if there are any changes needed.
7/1/2017	MO Gaming Association	11 CSR 45-9.106	Minimum Internal Control Standards (MICS) - Chapter F Poker Room	Oppose	We would like to transfer by the end of the gaming day instead of the end of the shift thus making it less of a hardship on the property.	MGC disagrees.This is required at all imprest windows; it is necessary to maintain accountability.

7/1/2017	MO Gaming Association	11 CSR 45-9.106	Minimum Internal Control Standards (MICS) - Chapter F Poker Room	Oppose	Modify the language to allow transfers to originate from a table or bank. Currently regulation is over restrictive and requires too many steps to exchange small amounts of chips at a table.	MGC disagrees. Since this is an imprest bank it would not be appropriate for the window to release chips without documentation being created or other chips being received.
7/1/2017	MO Gaming Association	11 CSR 45-9.106	Minimum Internal Control Standards (MICS) - Chapter F Poker Room	Support	Modify the regulation to allow for coloring up at any time so the game will not be slowed down.	MGC will consider revising the rule to allow coloring up during the game.
7/1/2017	MO Gaming Association	11 CSR 45-9.106	Minimum Internal Control Standards (MICS) - Chapter F Poker Room	Support	We question the need for all decks to be inspected by the dealer and supervisor. This should be changed so the supervisor is only allowed to observe. This would be consistent with other areas.	MGC agrees. MGC will look at revising the rule to require only the Dealer to inspect the cards.
7/1/2017	MO Gaming Association	11 CSR 45-9.107	Minimum Internal Control Standards (MICS) - Chapter G Drops and Counts	Oppose	The jumpsuit restrictions in 4.07 are overly restrictive. A property should have the ability to allow certain personnel such as EVS, MIS, service vendors and technicians the ability to enter the count room without wearing a one-piece jumpsuit when no funds are present. As an example, facilities painters should be allowed to wear painter's outfits.	MGC disagrees. EVS is not allowed in the count room presently. MGC can allow a one-time variance to allow a facilities painter to enter the count room to wear a painter's outfit instead of a one-piece jumpsuit.
7/1/2017	MO Gaming Association	11 CSR 45-9.107	Minimum Internal Control Standards (MICS) - Chapter G Drops and Counts	Oppose	We suggest elimination of the required full drop on Wednesday's. It should be left to the property to determine how often and on what day they should perform a drop. Taxes will continue to be estimated as outlined in the regulation and paid on a daily basis. If properties were not required to perform a full drop Wednesday mornings, it would be able to eliminate the mid-week drop and only drop once per week.	MGC disagrees. The closing of the casino floor once a week allows for the reconciling of the turnstile counts and allows the taxes to be accurately collected without relying on estimates.
7/1/2017	MO Gaming Association	11 CSR 45-9.107	Minimum Internal Control Standards (MICS) - Chapter G Drops and Counts	Oppose	We suggest moving to full 24-hour gaming with no mandatory requirement to close. Requiring the floor to be closed results in a loss of revenue to the state and property and guest dissatisfaction.	MGC disagrees. MGC has an obligation to ensure accurate collection of admission taxes.
7/1/2017	MO Gaming Association	11 CSR 45-9.107	Minimum Internal Control Standards (MICS) - Chapter G Drops and Counts	Oppose	Modify the regulation so the drop requires the presence of only one count team member and one security officer. Emergency drops only require one person.	MGC will revise portions of Chapter G
7/1/2017	MO Gaming Association	11 CSR 45-9.107	Minimum Internal Control Standards (MICS) - Chapter G Drops and Counts	Oppose	Would also support a 1-5 ratio change.	MGC disagrees. The commission believes the current ratio of 3 to 1 is barely adequate for security to monitor the collection of the drop devices. To expand it to 5 to 1 would essentially allow security to not monitor the revenue collection process.
7/1/2017	MO Gaming Association	11 CSR 45-9.107	Minimum Internal Control Standards (MICS) - Chapter G Drops and Counts	Oppose	We suggest the five foot rule be rescinded and drop zones modified to more closely match regulations in other jurisdictions. For instance, Nevada does not require a guest to leave their machine during the drop.	MGC has reviewed this regulation. Although no action is being taken at this time the MGC will look at revising this rule.
7/2/2017	MO Gaming Association	11 CSR 45-9.107	Minimum Internal Control Standards (MICS) - Chapter G Drops and Counts	Unknown	Remove reference to security personnel to "person independent of XYZ department".	MGC disagrees. MGC will continue to require Security presence during the drop.

7/1/2017	MO Gaming Association	11 CSR 45-9.107	Minimum Internal Control Standards (MICS) - Chapter G Drops and Counts	Support	The requirement specifying who can perform the emergency drop is overly restrictive. The property should be able to utilize slot techs in these situations if they elect to do so. A Slot Tech can open a cash box at the game with a Security escort and Surveillance notification, so the same should be allowed for E - drops. Making this change would allow for the game to be put back in play quicker for the guest.	MGC agrees. MGC will look at revising the rule and removing "independent of the Slot Department".
7/1/2017	MO Gaming Association	11 CSR 45-9.108	Minimum Internal Control Standards (MICS) - Chapter H Casino Cashiering	Oppose	The present requirement allowing over \$20,000 in imprest banks is overly restrictive. We suggest this amount be left to the property to determine which amount is carried.	MGC will revise portions of Chapter H. MGC will look at revising the rule to exempt the poker bank.
7/1/2017	MO Gaming Association	11 CSR 45-9.108	Minimum Internal Control Standards (MICS) - Chapter H Casino Cashiering	Oppose	We suggest the provision "all transactions be supported by documentation" be rescinded. Even exchanges with employees of a minimal value (i.e. \$10) are currently tracked on a signed form.	MGC will consider revising the rule to allow for cash for cash exchanges to not be documented under a certain threshold.
7/1/2017	MO Gaming Association	11 CSR 45-9.108	Minimum Internal Control Standards (MICS) - Chapter H Casino Cashiering	Oppose	At a minimum the MIC should be modified to exclude cash for cash transactions.	MGC will consider revising the rule to allow for cash for cash exchanges to not be documented under a certain threshold.
7/1/2017	MO Gaming Association	11 CSR 45-9.108	Minimum Internal Control Standards (MICS) - Chapter H Casino Cashiering	Oppose	Comment is the same as 5.03 suggesting the provision be rescinded.	MGC will consider revising the rule to allow for cash for cash exchanges to not be documented under a certain threshold.
7/1/2017	MO Gaming Association	11 CSR 45-9.108	Minimum Internal Control Standards (MICS) - Chapter H Casino Cashiering	Unknown	We suggest removing the requirement to count coins weekly. The amount of coins in a machine is minimal and should not be required to be counted each week.	MGC disagrees. The count of coins is required for an accurate reconciliation.
7/1/2017	MO Gaming Association	11 CSR 45-9.108	Minimum Internal Control Standards (MICS) - Chapter H Casino Cashiering	Oppose	Rescind the requirement for the individual who removes the seal on the cassette to record the seal number. Excessively burdensome process with minimal business risk.	MGC disagrees. The seal numbers are necessary to verify the individual reconciling the redemption kiosk is not the same person who prepared the cash cassettes in the kiosk.
7/1/2017	MO Gaming Association	11 CSR 45-9.108	Minimum Internal Control Standards (MICS) - Chapter H Casino Cashiering	Oppose	If the NRTs/ATMs are counted by the count room and not the Main Banker, the Main Banker can fill and "reconcile." The Revenue Audit department completes a full reconciliation of all kiosks.	MGC disagrees. It would be an improper segregation of duties to allow the same main banker to fill the cassettes as well as reconcile the kiosks.
7/1/2017	MO Gaming Association	11 CSR 45-9.108	Minimum Internal Control Standards (MICS) - Chapter H Casino Cashiering	Oppose	Rescind the requirement for the individual to compare the seal numbers on the count documentation. Excessively burdensome process with minimal business risk.	MGC disagrees. This is to ensure proper segregation of duties if the person reconciling the kiosk does not verify that he/she did not fill the cassettes that person would be essentially be checking his/her own work.
7/2/2017	MO Gaming Association	11 CSR 45-9.109	Minimum Internal Control Standards (MICS) - Chapter I	Oppose	Reference to investigate any variance amount is excessive. There should be a threshold set and if that threshold is exceeded then the property will investigate the variance.	MGC will look at revising this rule to be consistent with the CSR - 45-5.200. MGC will look at adding a threshold.
7/1/2017	MO Gaming Association	11 CSR 45-9.109	Minimum Internal Control Standards (MICS) - Chapter I	Oppose	Change the regulations that would enable the combination of the Cage and Player's Club.	MGC disagrees. These are intentionally segregated to prevent employees who have access to chips, cash, tokens, or tickets from being able to generate the source documentation used to generate point redemptions. Not segregating these duties would create a risk of employees stealing from patrons.

7/1/2017	MO Gaming Association	11 CSR 45-9.109	Minimum Internal Control Standards (MICS) - Chapter I	Oppose	Modify to allow for the creation of player account and printing of player card on the casino floor. Printing player's cards in the pit would be a service for our guests so they wouldn't have to leave the playing table to go to the club to get a players card. Current situation stops the player from continuing his/her play reducing revenue to the state. Other gaming regulators have adopted this structure which would help control costs and provide better guest service.	MGC is continuing to review the rule to determine if there are any changes needed.
7/1/2017	MO Gaming Association	11 CSR 45-9.109	Minimum Internal Control Standards (MICS) - Chapter I	Oppose	MGC instituted a new interpretation for the addition of points as it applied to ratings which separated the comp ability which is viewed as redeeming points from the ability to create a rating which is viewed as adding of points. Casinos have operated for many years with this capability and to have this new interpretation added a significant customer service and operational impact. The addition or redemption/removal of points should be specific to a manual process, such as the addition of points not specifically tied to a rating or the reduction of points from an account such as for a correction verses the issuance of a comp. The functionality of ratings and or comping should be a business decision. Mitigating controls can be put into place for identifying issues.	MGC disagrees. Both of these rules are necessary to ensure a proper segregation of duties and to protect gaming assets.
7/1/2017	MO Gaming Association	11 CSR 45-9.109	Minimum Internal Control Standards (MICS) - Chapter I	Oppose	We believe this section is overly burdensome and restrictive. A property should have flexibility to determine which of its employees can reset PIN's. We suggest removing "These positions shall not also be able to redeem points or issue player cards."	MGC disagrees. This rule does not discuss which employees can reset PINs. If MGC removes the last sentence, it would create a significant lack of segregation of duties.
7/1/2017	MO Gaming Association	11 CSR 45-9.109	Minimum Internal Control Standards (MICS) - Chapter I	Oppose	Ability to combine Ticketing & Cage Services. Increase guest service & ability to mitigate risk by including revenue audit review	MGC disagrees. The risk associated with combining these duties could not be mitigated by a revenue audit review. A revenue audit review would not be able to detect instances where a cashier redeemed points from a patron who was not present on the casino floor.
7/1/2017	MO Gaming Association	11 CSR 45-9.109	Minimum Internal Control Standards (MICS) - Chapter I	Oppose	We believe the regulation should allow all ticketing/marketing employees to reset pins. There is an ability to mitigate risk by including revenue audit review of transactions	MGC disagrees. The ability to reset PINs has been restricted to protect patrons. A revenue audit review would not be able to detect if a PIN was reset without the patron's permission.
7/1/2017	MO Gaming Association	11 CSR 45-9.110	Minimum Internal Control Standards (MICS) - Chapter J Admissions and Ticketing	Oppose	Remove - Allow casinos to operate 24/7 and not be required close.	MGC has reviewed this regulation and decided not to propose any revisions at this time.
7/1/2017	MO Gaming Association	11 CSR 45-9.110	Minimum Internal Control Standards (MICS) - Chapter J Admissions and Ticketing	Oppose	At a minimum the regulation should allow a property to choose the day of week to close or not close at all.	MGC has reviewed this regulation and decided not to propose any revisions at this time.
7/1/2017	MO Gaming Association	11 CSR 45-9.110	Minimum Internal Control Standards (MICS) - Chapter J Admissions and Ticketing	Oppose	Rescind the requirement for two sets of turnstiles with two separate reporting systems and an added manual process. Expectation is 100% accuracy when manufacturer has a 2% deviation rate.	MGC has reviewed this regulation and decided not to propose any revisions at this time.

7/1/2017	MO Gaming Association	11 CSR 45-9.111	Minimum Internal Control Standards (MICS) - Chapter K Currency Transaction Reporting	Oppose	Consideration should be given to rescind this entire chapter due to properties already complying with federal regulations and being subject to examinations. Missouri's standards should align with the federal regulations.	MGC has reviewed this regulation and decided not to propose any revisions at this time.
7/2/2017	MO Gaming Association	11 CSR 45-9.111	Minimum Internal Control Standards (MICS) - Chapter K Currency Transaction Reporting	Oppose	Re-verification is currently required every two years. We suggest it be revised to allow casinos to establish the re-verification window to align with their system and/or policies.	MGC has reviewed this regulation and decided not to propose any revisions at this time.
7/1/2017	MO Gaming Association	11 CSR 45-9.111	Minimum Internal Control Standards (MICS) - Chapter K Currency Transaction Reporting	Oppose	Should be every 2 years to allow property to establish window to align with their system and/or policies.	MGC has reviewed this regulation and decided not to propose any revisions at this time.
7/1/2017	MO Gaming Association	11 CSR 45-9.111	Minimum Internal Control Standards (MICS) - Chapter K Currency Transaction Reporting	Oppose	We suggest this provision is excessive and needs to be modified to more closely follow federal requirements in this area.	MGC has reviewed this regulation and decided not to propose any revisions at this time.
7/1/2017	MO Gaming Association	11 CSR 45-9.111	Minimum Internal Control Standards (MICS) - Chapter K Currency Transaction Reporting	Oppose	If the chapter is not rescinded, this section should be modified to align with federal requirements/guidelines.	MGC has reviewed this regulation and decided not to propose any revisions at this time.
7/1/2017	MO Gaming Association	11 CSR 45-9.112	Minimum Internal Control Standards (MICS) - Chapter L Internal Audit	Oppose	We have concerns with the duplicative nature of some audits required of our properties. We would propose any duplicative audits performed by the MGC to those statutorily required in Section 313.825 by independent auditors be discontinued. These audits are costly and time consuming to perform with little benefit especially in those instances when those items have already been the subject of another audit.	MGC has reviewed this regulation and decided not to propose any revisions at this time.
7/1/2017	MO Gaming Association	11 CSR 45-9.113	Minimum Internal Control Standards (MICS) - Chapter M Surveillance	Unknown	We suggest the Commission reconsider its surveillance staffing requirements. Present staffing levels were put into place several years ago and the regulation is a burden on the industry and we question the value of the present staffing levels. Missouri should explore options used in other states as it relates to surveillance staffing. Properties should be given the flexibility to determine the proper staffing levels for surveillance.	MGC has reviewed this regulation and is not proposing any revisions at this time.
7/1/2017	MO Gaming Association	11 CSR 45-9.113	Minimum Internal Control Standards (MICS) - Chapter M Surveillance	Oppose	Provisions of this section relating to possibly intoxicated patrons are too subjective and need to be reconsidered. Security and all personnel should be focused on pertinent job duties rather than spotting this for fear of punishment from MGC. It is too subjective and results in MGC agents having one opinion and casinos having another; therefore a person can be suspended for using their best judgment if the MGC agent disagrees/has a different opinion.	MGC has reviewed this regulation and is not proposing any revisions at this time.
7/1/2017	MO Gaming Association	11 CSR 45-9.113	Minimum Internal Control Standards (MICS) - Chapter M Surveillance	Oppose	Modify the regulation to allow employee signatures be an image captured.	MGC has reviewed this regulation and is not proposing any revisions at this time.

7/1/2017	MO Gaming Association	11 CSR 45-9.115	Minimum Internal Control Standards (MICS) - Chapter O Purchasing and Contract Administration	Oppose	We believe this entire chapter should be rescinded and the property allowed to make appropriate business decisions as it deems appropriate	MGC is continuing to review the rule to determine if there are any changes needed.
7/1/2017	MO Gaming Association	11 CSR 45-9.115	Minimum Internal Control Standards (MICS) - Chapter O Purchasing and Contract Administration	Oppose	Provisions dealing with related party transactions are excessive and should be considered for rescission.	MGC is continuing to review the rule to determine if there are any changes needed.
7/1/2017	MO Gaming Association	11 CSR 45-9.117	Minimum Internal Control Standards (MICS) - Chapter Q Disassociated Persons	Support	We suggest removing the casino operator from list. Some properties may use call centers which would be unable to route such calls to the proper department.	MGC will revise this rule to remove casino operator.
7/1/2017	MO Gaming Association	11 CSR 45-9.117	Minimum Internal Control Standards (MICS) - Chapter Q Disassociated Persons	Oppose	Enforcement of this rule is excessive for known patrons. We would request the ability to utilize a known patron list and only check DAP list once a day for a patron. Known patrons who have multiple transactions should not be required to present their ID each time in same gaming day.	MGC has reviewed this regulation and decided not to propose any revisions at this time.
7/1/2017	MO Gaming Association	11 CSR 45-9.118	Minimum Internal Control Standards (MICS) - Chapter R Forms	Unknown	Remove the Multiple Transaction Log since it is covered under federal regulations and subject to examinations.	Chapter R will be revised to incorporate the changes to the other MICS chapters.
7/1/2017	MO Gaming Association	11 CSR 45-9.118	Minimum Internal Control Standards (MICS) - Chapter R Forms	Unknown	Modify to allow captured signature images.	Chapter R will be revised to incorporate the changes to the other MICS chapters.
7/1/2017	MO Gaming Association	11 CSR 45-9.119	Minimum Internal Control Standards (MICS) - Chapter S Management Information Systems	Unknown	Seek to relax the FIPS 140 - 2 standard, a standard intended for governmental security and instead provide a technical depiction of internal wireless environment in use at all other properties. The combined security implemented on the wireless infrastructure devices at all other properties has met or exceeded jurisdictional requirements in other locations.	MGC has reviewed this regulation and is not proposing any revisions at this time.
7/1/2017	MO Gaming Association	11 CSR 45-9.119	Minimum Internal Control Standards (MICS) - Chapter S Management Information Systems	Unknown	The limitations in 5.05 cause challenges for some properties when dual rating. The regulation should allow for more than 1 active account to be used at a time with the property utilizing the proper mitigating controls.	MGC has reviewed this regulation and is not proposing any revisions at this time.
7/1/2017	MO Gaming Association	11 CSR 45-9.120	Minimum Internal Control Standards (MICS) - Chapter T Tips	Oppose	We believe the restriction for Poker Dealers pooling tokens and accepting tips on an individual basis at the same casino should be rescinded.	Amend to change the internal controls for Chapter T of the Minimum Internal Control Standards by allowing non-supervisory casino housekeeping/environmental service employees to accept tips. Proposed amendment filed 4/26/18.
7/1/2017	MO Gaming Association	11 CSR 45-9.120	Minimum Internal Control Standards (MICS) - Chapter T Tips	Support	We believe this regulation is excessive and should be rescinded. Surveillance already audits all areas and dealers so what is the need to require a specific monthly audit of poker dealers.	Amend to change the internal controls for Chapter T of the Minimum Internal Control Standards by allowing non-supervisory casino housekeeping/environmental service employees to accept tips. Proposed amendment filed 4/26/18.

7/1/2017	MO Gaming Association	11 CSR 45-9.121	Minimum Internal Control Standards (MICS) - Chapter U Cashless, Promotional, and Bonusing Systems	Oppose	This regulation is too restrictive and should be changed to allow for anyone at the player rewards desk or any supervisor on property to reset a guest PIN.	MGC has reviewed this regulation and is not proposing any revisions at this time.
7/1/2017	MO Gaming Commission Staff	11 CSR 45-10.115	List of Barred Persons	Support	This rule should be rescinded because it already exists in Chapter 15.	Rescind because the rule duplicates provisions of Title 11 CSR 45-15. Proposed rescission filed 12/7/2017.
7/31/2017	DraftKings, Inc.	11 CSR 45-40.030	Commission Approval of Procedures	Unknown	In section 5, add word "material" to the changes to approved procedures that need to be provided to the Commission.	Amend to remove language that duplicates the statute.
7/31/2017	DraftKings, Inc.	11 CSR 45-40.030	Commission Approval of Procedures	Unknown	Add "short-term receivable from payment processors, and reserves held at payment processors" in addition to cash and cash equivalents.	Amend to remove language that duplicates the statute.
8/13/2017	Cedric Brown	11 CSR 45-40.040	Fantasy Sports Contest Operator Responsibilities	Oppose	Eliminate some of the red tape and restrictions placed on fantasy sports participation. I used to play in season long \$10-\$20 leagues on Yahoo and Myfantasyleague.com but thanks to the new MO law I am unable to. I understand the need to regulate the industry but it is unfair to treat these small time peer-to-peer games as you do the giants of the industry (Draft Kings and FanDuel).	Sections 313.900-313.955 RSMo require any company including Yahoo to obtain a license prior to offering fantasy sports contests. We have no authority to waive the statutory requirement
7/1/2017	Anonymous	11 CSR 45-40.040	Fantasy Sports Contest Operator Responsibilities	Oppose	I like playing fantasy football online for money. It's not a lot of money but just enough to keep me invested and having fun. Because of the online gambling laws that went into place last year, I now cannot play this year. Yahoo is not offering their pay leagues in Missouri due to the licensing requirements. I'm a 34 year old professional. I don't need to be protected from spending \$100 to play fantasy football.	MGC has reviewed this regulation and is not proposing any revisions at this time.
7/31/2017	DraftKings, Inc.	11 CSR 45-40.060	Cash Reserve and Segregated Account Requirements	Support	Add "short-term receivable from payment processors, and reserves held at payment processors" in addition to cash and cash equivalents.	MGC has reviewed this regulation and decided not to propose any revisions at this time.
7/31/2017	DraftKings, Inc.	11 CSR 45-40.060	Cash Reserve and Segregated Account Requirements	Unknown	Recommend striking the requirement to "continuously monitor and maintain a record of all player deposits and its cash reserves to ensure compliance with the case reserves requirements."	MGC has reviewed this regulation and decided not to propose any revisions at this time.
7/1/2017	FanDuel, Inc.	11 CSR 45-40.100	Audits	Support	Request the financial audit portion of the rule be amended to either (1) require fantasy contest operators to conduct a financial audit annually and to submit it's most recently completed financial audit by March 1 of each year or (2) to require fantasy contest operators to conduct a financial audit annually and to submit it to the Commission upon its completion, but not later than November 1.	House Bill 1388 changed the due date of the audit. MGC will follow the mandate.
7/31/2017	DraftKing, Inc.	11 CSR 45-40.100	Audits	Support	Requests the deadline for submission of the audit report be June 1 instead of March 1.	House Bill 1388 changed the due date of the audit. MGC will follow the mandate.
8/30/2017	Paul Lewis	11 CSR 50-1.010	Organization and Operations	Oppose	Request DPS/MSHP develop formal, objective and all-inclusive towing regulations.	The MO State Highway Patrol (MSHP) has reviewed the rule and is not proposing any revisions at this time.

7/13/2017	Anonymous	11 CSR 50-2.010	Definitions	Oppose	Eliminate vehicle inspections in order to renew tags.	MSHP will amend this rule to add definition of "properly functioning" for LED lights, in response to provisions of SB 222 (2017).
7/13/2017	Anonymous	11 CSR 50-2.280	Air Pollution Control Devices	Oppose	Amend so passenger vehicles with non-standard engines can pass MO safety inspections.	MSHP will amend this rule to make clarification to section (10)(A) - add "gasoline-powered," changes to regulatory restrictions.
8/22/2017	Paul Lewis, Missouri Association of Beverage Retailers	11 CSR 70-2.120	Retail Licensees	Oppose	Present wording limiting blinds or curtains makes their use difficult for the convenience of retail customer and retailer ambience.	ATC removed most of the restrictions on window obstructions and limited it to restricting placement of objects that impede or obstruct vision from the outside in, which will allow for window coverings, and or limited signage.
8/22/2017	Paul Lewis, Missouri Association of Beverage Retailers	11 CSR 70-2.120	Retail Licensees	Unknown	Rule states sufficient lighting must be maintained at all times to ensure clear visibility into the interior and within the interior. Need to define "sufficient."	ATC did not feel the requirement of sufficient lighting in the interior of licenses premises could be eliminated because of the safety concerns of patrons and the regulation simply requires that lighting other than only illuminated signs be used, and clear visibility in the interior.
8/22/2017	Paul Lewis, Missouri Association of Beverage Retailers	11 CSR 70-2.120	Retail Licensees	Oppose	Rule does not allow any films, video programs, or pictures depicting acts or performances mentioned in the lewdness rule. Why aren't art galleries and movie theaters that serve alcohol subject to this rule?	ATC removed some of the language referring to obscene language, songs and entertainment because it's commonplace to find such in a bar without any quantifiable negative impact to customers.
8/22/2017	Paul Lewis, Missouri Association of Beverage Retailers	11 CSR 70-2.130	Retailer's Conduct of Business	Oppose	The rule mandates that at no time or under any circumstances shall a licensee or their employees immediately fail to present or suppress any violent quarrel, brawl, fight, etc. Not all employees are physically capable of stepping in to prevent an altercation.	ATC assumes licensees should attempt to suppress violent situations, if necessary by calling local law enforcement.
8/22/2017	Paul Lewis, Missouri Association of Beverage Retailers	11 CSR 70-2.130	Retailer's Conduct of Business	Oppose	Clarify which "illegal acts" are important to ATC and law enforcement so the licensee and employees can actually be of assistance.	ATC believes most retailers know what types of concerns should be addressed and the existing language is sufficient.
8/22/2017	Paul Lewis, Missouri Association of Beverage Retailers	11 CSR 70-2.130	Retailer's Conduct of Business	Oppose	ATC needs to define "obscene language" as it pertains to specific retail licensees' situations.	ATC removed some of the language referring to obscene language, songs and entertainment because it's commonplace to find such in a bar without any quantifiable negative impact to customers.
8/22/2017	Paul Lewis, Missouri Association of Beverage Retailers	11 CSR 70-2.130	Retailer's Conduct of Business	Oppose	The lewdness regulation - simulation of acts by a customer or a retailer is a violation - be specific what is permitted, what is not.	ATC believes lewdness is defined adequately.
8/22/2017	Paul Lewis, Missouri Association of Beverage Retailers	11 CSR 70-2.130	Retailer's Conduct of Business	Unknown	Premises of retailer declared off-limits by military authorities change rule from "shall not permit" to shall not knowingly permit."	ATC has reviewed this provision and is not proposing any revisions at this time.
8/22/2017	Paul Lewis, Missouri Association of Beverage Retailers	11 CSR 70-2.130	Retailer's Conduct of Business	Unknown	Define "unlawful act" - term "illegal act" appears to be interchangeable in many statutes.	ATC believes unlawful act and illegal act are interchangeable. This provision was not changed.

8/28/2019	Robert Cornejo	11 CSR 70-2.240	Advertising of Intoxicating Liquor and Nonintoxicating Beer	Oppose	re: recent opinion issued by the Eighth Circuit Court of Appeals regarding our state rules on public advertising of alcohol. The basis of this opinion is that the current rule substantially prohibits commercial free speech that far outweighs any perceived societal benefit.	In the past several years, there has been legislation proposed that would eliminate or broaden statutes that would allow advertising sales and discounted liquor. So far there has not been enough support to pass in the legislature. Missouri Broadcasting Association has sued Alcohol and Tobacco Control because they believe the laws limit their free speech rights. However, ATC believes advertising of intoxicating liquors is restricted to promote responsible drinking and lessen the prevalence of minors drinking and persons from overconsuming. Advertising steep discounts and low sale prices increases the effects of irresponsible drinking.
7/9/2017	Theodis Brown	11 CSR 75-1.010	General Organization	Support	Keep the rules intact.	Peace Officer Standards and Training (POST) has reviewed this regulation and is not proposing any revisions at this time.
7/31/2017	Steve Hampton	11 CSR 75-14.020	Minimum Requirements for Basic Training Centers	Support	Leave rule intact.	Peace Officer Standards and Training (POST) has reviewed this regulation and is not proposing any revisions at this time.
8/21/2017	Richard Tienter	11 CSR 75-14.030	Standard Basic Training Curricula and Objectives	Unknown	There needs to be further standardization for all departments in the state. Further standards will result in more departments professionalism. Take fire arms as an example, there needs to be a "minimum passing standard" for hired police officers. This proficiency needs to be demonstrated at least annually, if not more.	POST will amend this rule to allow for additional training flexibility with the goal of covering these training topics in much greater detail. The current rule requires the training provider to very briefly touch on multiple complex training topics instead of giving a detailed and proper course of instruction, which was not the intent of the Peace Officer Standards and Training Commission.
8/23/2017	Austin Turner	11 CSR 75-15.010	Continuing Education Requirements	Oppose	Would like to see the current continuing education requirements rescinded and replaced with the former continuing education requirements.	POST will amend this rule to eliminate any mention of a three- (3-) year Continuing Law Enforcement Education (CLEE) reporting period. The last three- (3-) year reporting period ended in December 31, 2017. The amendment also eliminates the ability to carry over continuing education credit from one reporting period to the next. This amendment eliminates the requirement to complete training in the separate topic areas of officer well-being, including mental health and/or physical health awareness; fair and impartial policing practices including implicit bias recognition; handling persons with mental health or cognitive impairment issues; and tactical training, which must include one (1) or more of the following areas: de-escalation techniques, crisis management, critical thinking, or social intelligence. The amendment also eliminates the need to restrict the number of continuing education credit hours that can be awarded to continuing education or basic training instructors.

7/18/2017	Ramey Chisum	11 CSR 75-15.020	Minimum Standards for Continuing Education Training	Unknown	Improve POST training requirements re: confronting an abusive family.	POST will amend this rule to add “officer well-being” to the description of Interpersonal Perspectives and “de-escalation techniques” to the description of Skill Development. This amendment changes the amount of CLEE credit awarded for basic and CLEE instruction to one (1) hour of CLEE credit for each hour of instruction. This amendment eliminates the need to list the training topics of “officer well-being, including mental health and/or physical health awareness; fair and impartial policing practices, including implicit bias recognition; handling persons with mental health or cognitive impairment issues; and tactical training, which must include one (1) or more of the following areas: de-escalation techniques, crisis management, critical thinking, or social intelligence” to the certificate of training completion.
7/24/2017	Theodis Brown	11 CSR 75-18.010	Procedure to Obtain a Corporate Security Advisor License	Oppose	Requirements to obtain a corporate security advisor license is too stringent.	POST has reviewed this regulation and is not proposing any revisions at this time.
9/1/2017	Theodis Brown	11 CSR 75-18.060	Cause to Discipline Corporate Security Advisor Licensee	Oppose	Unjust rule. On size of entity, minority disadvantaged small business owners need same right as big business on being able to get license plus legal opinion 85 of 1979 needs to grandfather veteran cops.	POST has reviewed this regulation and is not proposing any revisions at this time.
8/30/2017	Dawn Kohler	11 CSR 80-9.010	Mandatory Boater Safety Education Program	Unknown	Need to expand motor boat regulations and boater safety course.	The standards established by the National Association of State Boating Law Administrators for certified boater education are the minimum standards utilized for certified courses approved by the MSHP. No revisions to this rule are proposed at this time.
8/31/2017	Colleen Coble, Executive Director, MO Coalition Against Domestic and Sexual Violence	8 CSR 50.6.010	Rules Governing Crime Victims	Oppose	Crime Victims' Compensation rules have not been updated since 1999. The program is administered by DPS but rules remain in DOLIR. Increase reporting time for sexual assault victims to qualify. Include good cause exemptions for those seeking compensation as victims of crime. Update rule to add eligibility for crime victims not now included under violent offenses (stalking, trafficking, etc.)	DPS has proposed a new rule for the Crime Victims' Compensation program. The proposed rule reflects necessary changes needed in the Code of State Regulations to illustrate the transfer of this program from DOLIR to DPS and to prevent duplication of the CVC program's intent as described in Chapter 595, RSMo. It also clarifies the requirements for filing and processing compensation claims.