



# 25 CFR 543.17 Toolkit Drop and Count



NIGC Training Program

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## Introduction

Over thirty years ago, Congress adopted the Indian Gaming Regulatory Act (IGRA) to provide a statutory basis for gaming by Indian tribes. The National Indian Gaming Commission (NIGC) was created by IGRA to regulate gaming activities conducted by sovereign Indian tribes on Indian lands. The mission of the NIGC is to fully realize IGRA's goals of: (1) promoting tribal economic development, self-sufficiency, and strong tribal governments; (2) maintaining the integrity of the Indian gaming industry; and (3) ensuring that tribes are the primary beneficiaries of their gaming activities. One of the primary ways the NIGC does this is by providing training and technical assistance to Indian tribes and their gaming regulators.

The NIGC is pleased to present this Toolkit to all Compliance and Auditing staff. This reference guide is intended to assist Auditors, Gaming Commissioners, and Operations' personnel in measuring compliance of their operation(s) with 25 CFR 543.17. The Toolkit provides each standard of 543.17, the intent of the standard, and minimum testing steps. Auditing to the intent and following the minimum testing steps ensure regulatory compliance.

This Toolkit is designed to meet the minimum requirements of the NIGC Minimum Internal Control Standards (MICS) and does not account for the Operations' Tribal Internal Control Standards (TICS) and/or System of Internal Control Standards (SICS), which may require further testing. The NIGC encourages Operations to develop standards that exceed the MICS because each Operation is unique; therefore, a robust set of controls is warranted.

If you have questions or comments about this guide, please contact the NIGC Compliance Division at [traininginfo@nigc.gov](mailto:traininginfo@nigc.gov). For more information, visit the NIGC website at <http://www.nigc.gov>.

## Table of Contents

Click a section below to jump to the topic.

<b>1. How to use this Toolkit .....</b>	<b>4</b>
<b>2. Glossary .....</b>	<b>5</b>
<b>3. NIGC Drop and Count – 25 CFR 543.17 Toolkit.....</b>	<b>7</b>
543.17(a): Supervision.....	7
543.17(b): Count room access .....	8
543.17(c): Count team .....	11
543.17(d): Card game drop standards .....	14
543.17(e): Player interface and financial instrument storage component drop standards .....	18
543.17(f): Card game count standards.....	22
543.17(g): Player interface financial instrument count standards.....	38
543.17(h): Collecting currency cassettes and financial instrument storage components from kiosks .....	54
543.17(i): Kiosk count standards .....	57
543.17(j): Controlled keys .....	61
543.17(k): Variances.....	69

## How to use this Toolkit

The Training Department has designed this Toolkit as a resource for understanding 25 CFR 543.17 Drop and Count Minimum Internal Control Standards (MICS). It can be used as a tool when conducting an audit of the Drop and Count standards of all gaming departments in determining compliance with the regulation. The Toolkit provides many practical and concrete suggestions for understanding and evaluating compliance for the regulation for both experienced and new auditors during any stage of the auditing process.

See the call outs below for what can be found in each section of the toolkit.

**Glossary**

TERM	DEFINITION
Accountability	All financial instruments, receivables, and patron deposits constituting the total amount for which the bankroll custodian is responsible at a given time.

**QUICK LINKS**  
[Table of Contents](#) [Glossary](#)  
 7

 **Glossary**

Clarify the meaning of terms used in this Toolkit.

 **Quick Links**

Easily navigate back to the table of contents or glossary with the links at the bottom of each page.

 **Regulation**


The verbatim language of each section in the 25 CFR 543.17 Drop and Count Minimum Internal Control Standards.

25 CFR 543.17 Toolkit Drop and Count

**NIGC Drop and Count – 25 CFR 543.17 Toolkit**


**543.17(a): Supervision**

Supervision must be provided for drop and count as needed by an agent(s) with authority equal to or greater than those being supervised.




**Intent**

To provide for proper supervision for drop and count activities to ensure activities are conducted correctly and accurately and to help ensure the integrity of the drop and count activities.



**Testing**

- ✓ Review organizational charts, department schedules, job descriptions, employee listings, etc., for personnel who perform and supervise the drop and count activities.
- ✓ Observe how supervision is provided during the drop and count process to verify proper supervision.
- ✓ Inquire with supervisory personnel to determine what tasks are performed as part of the supervision of drop and count activities.



**Best Practice**

Effective supervision should be provided by someone of greater authority than those being supervised. If supervision is provided by an agent(s) of equal authority, consider additional controls for sensitive reviews, such as those which may detect possible incidents of collusion.

 **Intent**

The purpose of the regulation and the importance of the control.

 **Testing**

Minimum testing to evaluate compliance.

 **Best Practice**

Commonly observed industry procedures.

## Glossary

Definitions from 25 CFR 543.2

### TERM

<b>Accountability</b>	All financial instruments, receivables, and patron deposits constituting the total amount for which the bankroll custodian is responsible at a given time.
<b>Agent</b>	A person authorized by the gaming operation, as approved by the TGRA, to make decisions or perform assigned tasks or actions on behalf of the gaming operation.
<b>Cage</b>	A secure work area within the gaming operation for cashiers, which may include a storage area for the gaming operation bankroll.
<b>Cash equivalents</b>	Documents, financial instruments other than cash, or anything else of representative value to which the gaming operation has assigned a monetary value. A cash equivalent includes, but is not limited to, tokens, chips, coupons, vouchers, payout slips and tickets, and other items to which a gaming operation has assigned an exchange value.
<b>Class II gaming</b>	Games of chance such as bingo (whether or not electronic, computer, or other technological aids are used in connection therewith in), pull tabs, and non-banked card games (poker).
<b>Class II gaming system</b>	All components, whether or not technologic aids in electronic, computer, mechanical, or other technologic form, that function together to aid the play of one or more Class II games, including accounting functions mandated by these regulations or part 547 of this chapter.
<b>Independent</b>	The separation of functions to ensure that the agent or process monitoring, reviewing, or authorizing the controlled activity, function, or transaction is separate from the agents or process performing the controlled activity, function, or transaction.
<b>Kiosk</b>	A device capable of redeeming vouchers and/or wagering credits or initiating electronic transfers of money to or from a patron deposit account.
<b>MICS</b>	Minimum internal control standards in this part.
<b>Patron</b>	A person who is a customer or guest of the gaming operation and may interact with a Class II game. May also be referred to as a "player".

TERM	DEFINITION
<b>Player interface</b>	Any component(s) of a Class II gaming system, including an electronic or technologic aid (not limited to terminals, player stations, handhelds, fixed units, etc.), that directly enables player interaction in a Class II game.
<b>Prize payout</b>	Payment to a player associated with a winning or qualifying event.
<b>Shift</b>	A time period, unless otherwise approved by the tribal gaming regulatory authority, not to exceed 24 hours.
<b>SICS</b>	System of internal control standards; an overall operational framework for a gaming operation that incorporates principles of independence and segregation of function, and is comprised of written policies, procedures, and standard practices based on overarching regulatory standards specifically designed to create a system of checks and balances to safeguard the integrity of a gaming operation and protect its assets from unauthorized access, misappropriation, forgery, theft, or fraud.
<b>Tier A</b>	Gaming operations with annual gross gaming revenues of more than \$3 million but not more than \$8 million.
<b>Tier B</b>	Gaming operations with annual gross gaming revenues of more than \$8 million but not more than \$15 million.
<b>Tier C</b>	Gaming operations with annual gross gaming revenues of more than \$15 million.
<b>TGRA</b>	Tribal gaming regulatory authority, which is the entity authorized by tribal law to regulate gaming conducted pursuant to the Indian Gaming Regulatory Act.
<b>TICS</b>	Tribal Internal Control Standards established by the TGRA that are at least as stringent as the standards set forth in this part.
<b>Vault</b>	A secure area where cash and cash equivalents are stored.
<b>Voucher</b>	A financial instrument of fixed wagering value, usually paper, that can be used only to acquire an equivalent value of cashable credits or cash through interaction with a voucher system.

## NIGC Drop and Count – 25 CFR 543.17 Toolkit

### 543.17(a): Supervision

Supervision must be provided for drop and count as needed by an agent(s) with authority equal to or greater than those being supervised.



#### Intent

To provide for proper supervision for drop and count activities to ensure activities are conducted correctly and accurately and to help ensure the integrity of the drop and count activities.



#### Testing

- ✓ Review organizational charts, department schedules, job descriptions, employee listings, etc., for personnel who perform and supervise the drop and count activities.
- ✓ Observe how supervision is provided during the drop and count process to verify proper supervision.
- ✓ Inquire with supervisory personnel to determine what tasks are performed as part of the supervision of drop and count activities.



#### Best Practice

Effective supervision should be provided by someone of greater authority than those being supervised. If supervision is provided by an agent(s) of equal authority, consider additional controls for sensitive reviews, such as those which may detect possible incidents of collusion.

## 543.17(b): Count room access

Controls must be established and procedures implemented to limit physical access to the count room to count team agents, designated staff, and other authorized persons. Such controls must include the following:

- (1) Count team agents may not exit or enter the count room during the count except for emergencies or scheduled breaks.



### Intent

To maintain the integrity of count room security and ensure cash and cash equivalents held within are adequately protected from misappropriation of funds by anyone entering or exiting during the count.



### Testing

- ✓ Review TICS and/or SICS to verify policies and procedures have been implemented that adequately preserve count team agents not exiting or entering the count except for emergencies or scheduled breaks.
- ✓ Inquire with count team and/or supervisory personnel to determine the process for entering or exiting the count room during the count.
- ✓ Observe the count process for authorized/unauthorized agents exiting or entering the count room during the count and to determine if exiting/entering is permitted only for emergencies or scheduled breaks.
- ✓ Review and compare count room access, authorized agents' listings, and count team-approved break schedule(s).



### Best Practice

Operations generally identify designated staff and any other authorized persons in their SICS. In addition, a sign-in/out log, including information such as date, time, individual(s) entering/exiting, reason for access, and escort (if applicable), provides a means to assist in investigating occurrences and provides a comparison document to confirm surveillance notification during an audit. Breaktimes could be planned and communicated on count team schedules.



## NIGC Drop and Count – 25 CFR 543.17 Toolkit

### 543.17(b): Count room access

Controls must be established and procedures implemented to limit physical access to the count room to count team agents, designated staff, and other authorized persons. Such controls must include the following:

(2) Surveillance must be notified whenever count room agents exit or enter the count room during the count.



#### Intent

To ensure surveillance is aware and monitoring count room accesses during the count, to aid in preventing misappropriation of funds or other inappropriate activities, and to promote the safety of the count team.



#### Testing

- ✓ Review TICS and/or SICS to confirm controls and procedures that have been established for notification of surveillance.
- ✓ Inquire with count team, surveillance, and/or supervisory personnel to determine if surveillance is notified when the count team or other authorized agents exit or enter the count room during the count.
- ✓ Observe the process to determine if surveillance is notified of agents entering or exiting the count room during the count.
- ✓ Review surveillance logs or other documents utilized to record the notification.



#### Best Practice

Identify the agent(s) responsible for notifying surveillance in the operation's SICS.

## NIGC Drop and Count – 25 CFR 543.17 Toolkit

### 543.17(b): Count room access

Controls must be established and procedures implemented to limit physical access to the count room to count team agents, designated staff, and other authorized persons. Such controls must include the following:

- (3) The count team policy, at a minimum, must address the transportation of extraneous items such as personal belongings, tool boxes, beverage containers, etc., into or out of the count room.



#### Intent

To prevent misappropriation of funds or other valuable assets from the count room and to limit any unnecessary items in the count room to help maintain count room security and promote count team safety.



#### Testing

- ✓ Review TICS and/or SICS to confirm if controls and procedures address the transportation of extraneous items into or out of the count room.
- ✓ Inquire with supervisory and/or count team personnel to determine what controls and procedures are in place to address, at a minimum, the transportation of extraneous items into or out of the count room and what the procedures are if an extraneous item is discovered.
- ✓ Conduct an observation of the count room to determine if extraneous items are transported into or out of the count room.



#### Best Practice

Typically, an operation identifies the type of items that would be considered extraneous in their SICS. Utilizing clear containers allows for surveillance of contents.

## 543.17(c): Count team

Controls must be established and procedures implemented to ensure security of the count and the count room to prevent unauthorized access, misappropriation of funds, forgery, theft, or fraud. Such controls must include the following:

- (1) For Tier A and B operations, all counts must be performed by at least two agents. For Tier C operations, all counts must be performed by at least three agents.
- (2) For Tier A and B operations, at no time during the count can there be fewer than two count team agents in the count room until the drop proceeds have been accepted into cage/vault accountability. For Tier C operations, at no time during the count can there be fewer than three count team agents in the count room until the drop proceeds have been accepted into cage/vault accountability.



### Intent

To ensure the security of the count and maintain the integrity of count activities by having the required number of agents present for the count of each revenue source.



### Testing

- ✓ Review TICS and/or SICS to determine if controls and procedures have been established to ensure the appropriate number of agents are present during the performance of the count.
- ✓ Inquire with count team personnel to determine if there are at least the required number of count team agents in the count room during the count until the drop proceeds have been accepted into cage/vault accountability.
- ✓ Review count team schedules to determine if an adequate number of agents are scheduled.
- ✓ Observe the specified number of agents present during the count.



### Best Practice

Determine if additional controls in an operation's SICS are necessary to ensure the appropriate number of agents are present during the performance of the count for instances such as callouts, or other situations that may impact the number of agents available.

## NIGC Drop and Count – 25 CFR 543.17 Toolkit

### 543.17(c): Count team

Controls must be established and procedures implemented to ensure security of the count and the count room to prevent unauthorized access, misappropriation of funds, forgery, theft, or fraud. Such controls must include the following:

- (3) For Tier A and B operations, count team agents must be rotated on a routine basis such that the count team is not consistently the same two agents more than four days per week. This standard does not apply to gaming operations that utilize a count team of more than two agents. For Tier C operations, count team agents must be rotated on a routine basis such that the count team is not consistently the same three agents more than four days per week. This standard does not apply to gaming operations that utilize a count team of more than three agents.
- (4) Functions performed by count team agents must be rotated on a routine basis.



#### Intent

To ensure the security of the count and maintain the integrity of count activities by rotating count team agents on a routine basis.



#### Testing

- ✓ Review TICS and/or SICS to determine controls and procedures that have been established for the rotation of duties.
- ✓ Inquire with supervisory and/or count team personnel to determine the process for rotating count team members.
- ✓ Observe the number of agents present during the count.
- ✓ Review department schedules and duty assignments for the count team for the selected test period.



#### Best Practice

Drop and count management typically creates their schedule, keeping this rotation in mind so the schedule identifies the agents' functions for their assigned day.

### 543.17(c): Count team

Controls must be established and procedures implemented to ensure security of the count and the count room to prevent unauthorized access, misappropriation of funds, forgery, theft, or fraud. Such controls must include the following:

- (5) Count team agents must be independent of the department being counted. A cage/vault agent may be used if they are not the sole recorder of the count and do not participate in the transfer of drop proceeds to the cage/vault. An accounting agent may be used if there is an independent audit of all count documentation.



#### Intent

To ensure the security of the count and maintain the integrity of count activities by requiring that count team agents are independent of the department(s) being counted.



#### Testing

- ✓ Review TICS and/or SICS to verify controls and procedures that have been developed to identify the count team.
- ✓ Inquire with supervisory and/or count team personnel to determine if agents are independent of the departments being counted and verify if an exception applies, i.e., accounting or cage personnel assisting in the count.
- ✓ Observe the count process on the selected test date to determine who performs the count.
- ✓ Review the operation's organizational charts, employee roles listings, shift schedule, and/or list of agents (with names and titles) for the count you are reviewing to verify that the count team is independent.



#### Best Practice

Count team agents must be independent of the department being counted. A cage/vault agent may be used if they are not the sole recorder of the count and do not participate in the transfer of drop proceeds to the cage/vault. An accounting agent may be used if there is an independent audit of all count documentation.

## 543.17(d): Card game drop standards

Controls must be established, and procedures implemented to ensure security of the drop process. Such controls must include the following:

- (1) Surveillance must be notified when the drop is to begin so that surveillance may monitor the activities.
- (2) At least two agents must be involved in the removal of the drop box, at least one of whom is independent of the card games department.
- (3) Once the drop is started, it must continue until finished.



### Intent

To prevent the risk of collusion or other inappropriate activities by segregating duties and limiting the involvement of pit personnel.



### Testing

- ✓ Review TICS and/or SICS to verify policies and procedures have been implemented to adequately include security of card game drop box removals.
- ✓ Inquire with count team and/or surveillance personnel to determine the process for notifying surveillance when the drop is to begin so that surveillance may monitor the activities, to determine if two agents are involved in the removal of the drop box and if one agent is independent of the card games department, and to determine if, once the card game drop is started, it continues until finished.
- ✓ Observe the drop process to confirm surveillance is notified; determine who performs the removal of drop boxes; confirm that two agents are involved in the removal of the drop box, with one being independent of the card games department; and determine if the drop is completed in its entirety.
- ✓ Review surveillance logs to confirm notification and compare it to video footage (if applicable), drop team schedule, and employee listing.



### Best Practice

Typically, the agent(s) responsible for notifying surveillance is identified in an operation's SICS. In addition, when a SICS is established, operations may include prohibitions to identify job titles that are not appropriate to perform the drop.

## NIGC Drop and Count – 25 CFR 543.17 Toolkit

### 543.17(d): Card game drop standards

Controls must be established, and procedures implemented to ensure security of the drop process. Such controls must include the following:

- (4) All drop boxes may be removed only at the time previously designated by the gaming operation and reported to the TGRA. If an emergency drop is required, surveillance must be notified before the drop is conducted and the TGRA must be informed within a timeframe approved by the TGRA.



#### Intent

To ensure the security of the drop and maintain the integrity of drop activities to prevent the risk of collusion or other inappropriate activities.



#### Testing

- ✓ Review TICS and/or SICS to ensure controls and procedures have been established for regular drop box removal and providing for emergency drop notification to surveillance and the TGRA.
- ✓ Inquire with drop team and/or supervisory personnel to determine the process for the card games drop.
- ✓ Inquire with TGRA personnel to confirm the approved timeframe for notification of an emergency drop.
- ✓ Observe the start of the drop process to verify if the drop boxes are removed at the time previously designated and process of an emergency drop.
- ✓ Request the approved drop schedule from the TGRA for review.



#### Best Practice

Typically, drop schedules are created by management and reported to the TGRA. The timeframe for an emergency drop notification to the TGRA is best identified in the operation's SICS.

## NIGC Drop and Count – 25 CFR 543.17 Toolkit

### 543.17(d): Card game drop standards

Controls must be established, and procedures implemented to ensure security of the drop process. Such controls must include the following:

- (5) At the end of each shift:
  - (i) All locked card game drop boxes must be removed from the tables by an agent independent of the card game shift being dropped;
  - (ii) For any tables opened during the shift, a separate drop box must be placed on each table, or a gaming operation may utilize a single drop box with separate openings and compartments for each shift; and
  - (iii) Card game drop boxes must be transported directly to the count room or other equivalently secure area by a minimum of two agents, at least one of whom is independent of the card game shift being dropped, until the count takes place.



#### Intent

To ensure the security of the drop and maintain the integrity of drop activities to prevent the risk of collusion or other inappropriate activities.



#### Testing

- ✓ Review TICS and/or SICS to verify policies and procedures have been established to cover access to locked card game drop boxes and transportation of card game drop boxes.
- ✓ Inquire with drop team personnel to determine the process for the card games drop to conclude if, at the end of a shift, all locked card game drop boxes are removed from the tables by an agent independent of the card game shift being dropped; if, for any tables opened during the shift, a separate drop box is placed on each table or, alternatively, a single drop box with separate openings and compartments for each shift is used; and where are card game drop boxes stored to await the count.
- ✓ Observe the drop process to determine who removes and replaces the drop boxes, what type of drop boxes are used, how many agents transport the card game drop boxes, and where they are transported and secured.
- ✓ Review organizational charts and employee listings to verify person(s) are independent of the card game shift.



#### Best Practice

When a SICS is established, operations may include prohibitions that identify job titles not appropriate to perform the drop. In addition, within their SICS operations commonly identify the secure area that drop boxes will be transported to if the count room is not utilized.



## NIGC Drop and Count – 25 CFR 543.17 Toolkit

### 543.17(d): Card game drop standards

Controls must be established and procedures implemented to ensure security of the drop process. Such controls must include the following:

- (6) All tables that were not open during a shift and therefore not part of the drop must be documented.
- (7) All card game drop boxes must be posted with a number corresponding to a permanent number on the gaming table and marked to indicate game, table number, and shift, if applicable.



#### Intent

To ensure the security of the drop and maintain the integrity of drop activities to prevent the risk of collusion, or other inappropriate activities and commingling of card games revenues.



#### Testing

- ✓ Review TICS and/or SICS to verify policies and procedures have been established to cover documentation regarding card game drop boxes.
- ✓ Inquire with drop team personnel and card game management to determine what procedures are in place to ensure the operation is aware that a drop box will not be picked up from a particular table; what records exist for tables that were not opened during a drop; and that each drop box is correctly assigned to its respective table to prevent commingling and misplacement.
- ✓ Observe any markings on the drop box to indicate table and shift and coordinating information permanently displayed on the table; note any tables that were not open during a shift.
- ✓ Review documentation showing any tables that were not part of the drop.



#### Best Practice

Most often, management implements a log to document open/close status by shift to identify those tables that were not part of the drop.

## 543.17(e): Player interface and financial instrument storage component drop standards

- (1) Surveillance must be notified when the drop is to begin so that surveillance may monitor the activities.
- (2) At least two agents must be involved in the removal of the player interface storage component drop, at least one of whom is independent of the player interface department.



### Intent

To ensure surveillance monitors the drop process and duties of drop personnel are segregated, limiting the involvement of player interface personnel to minimize the risk of collusion or other inappropriate activities.



### Testing

- ✓ Inquire with drop team, security, and surveillance personnel to determine the notification process for the player interface and financial instrument storage component drop standards and who is involved in the removal of drop boxes.
- ✓ Observe the drop process to determine if surveillance is notified, who performs the removal of the player interface storage component, and if at least two agents are involved in the removal of the player interface storage component with at least one being independent of the player interface department.
- ✓ Review the surveillance log for notification and compare it to video footage (if applicable), organizational charts, drop team schedule, and employee listing to determine proper agent independence.



### Best Practice

Typically, the agent(s) responsible for notifying surveillance is identified in an operation's SICS. In addition, when a SICS is established, operations may include prohibitions that identify job titles not appropriate to perform the drop.

### 543.17(e): Player interface and financial instrument storage component drop standards

- (3) All financial instrument storage components may be removed only at the time previously designated by the gaming operation and reported to the TGRA. If an emergency drop is required, surveillance must be notified before the drop is conducted and the TGRA must be informed within a timeframe approved by the TGRA.



#### Intent

To minimize the risk of collusion or other inappropriate activities by segregating duties and limiting the involvement of player interface personnel.



#### Testing

- ✓ Review TICS and/or SICS to ensure controls and procedures have been established for regular drop box removal and providing for emergency drop notification to surveillance and the TGRA.
- ✓ Inquire with drop team personnel to determine the player interface and financial instrument storage component drop process to conclude if the time designated for removal of the financial instrument storage components has been reported to the TGRA and what procedures and TGRA-approved timeframe are followed if an emergency drop is necessary.
- ✓ Observe the start of the drop process to verify if the drop commenced at the time previously designated by the operation.
- ✓ Observe live or review surveillance footage of an emergency drop to determine the emergency drop procedures executed.
- ✓ Request approved drop schedule from TGRA for review.



#### Best Practice

Typically, drop schedules are created by management and reported to the TGRA. The timeframe for an emergency drop notification to the TGRA is best identified in the operation's SICS.

## NIGC Drop and Count – 25 CFR 543.17 Toolkit

### 543.17(e): Player interface and financial instrument storage component drop standards

- (4) The financial instrument storage components must be removed by an agent independent of the player interface department, then transported directly to the count room or other equivalently secure area with comparable controls and locked in a secure manner until the count takes place.
  - (i) Security must be provided for the financial instrument storage components removed from player interfaces and awaiting transport to the count room.
  - (ii) Transportation of financial instrument storage components must be performed by a minimum of two agents, at least one of whom is independent of the player interface department.



#### Intent

To minimize the risk of collusion or other inappropriate activities by ensuring adequate security is provided in the collection and transportation of financial instrument storage components.



#### Testing

- ✓ Inquire with drop team personnel to determine the drop process regarding agents involved, security provided, and storage of financial instrument storage components until the count takes place.
- ✓ Observe the drop process to determine who removes and replaces the financial instrument storage components, what security is provided, how many agents transport the financial instrument storage components, and where they are transported and secured.
- ✓ Review organizational charts and employee listings to verify that at least one agent is independent of the player interface department.



#### Best Practice

If an area other than the count room is to be utilized, it is best that the secure area be identified within an operation's SICS. Typically, scheduling involves coordination with all departments involved to ensure security is available for the drop process. In addition, when a SICS is established, operations may include prohibitions that identify job titles not appropriate to perform the drop.

- (5) All financial instrument storage components must be posted with a number corresponding to a permanent number on the player interface.



#### Intent

To minimize the risk of misappropriation of funds or other inappropriate activities by ensuring financial instrument storage components are removed and replaced in the player interface accurately.



#### Testing

- ✓ Inquire with drop team personnel to determine how financial instrument storage components are identified and correctly assigned to their respective player interface to prevent commingling and misplacement.
- ✓ Observe any markings on the financial instrument storage components to indicate the player interface number and coordinating information permanently displayed on the player interface.
- ✓ Review documentation showing identification of numbered financial instrument storage components and corresponding player interface.



#### Best Practice

When establishing the SICS, consider the number that will be utilized. Typically, it is the player interface serial number and location number. Ensure the person responsible for labeling financial instrument storage components is identified through procedures. When making these decisions, keep in mind the process for machine movement through floor changes, as well as the receipt and storage of replacement components.

## 543.17(f): Card game count standards

- (1) Access to stored, full card game drop boxes must be restricted to:
- (i) Authorized members of the drop and count teams; and
  - (ii) In an emergency, authorized persons for the resolution of a problem.



### Intent

To minimize the risk of misappropriation of funds or other inappropriate activities by ensuring stored, full card game drop boxes are restricted to only authorized agents.



### Testing

- ✓ Inquire with drop team personnel to determine who the authorized members are who have access to full card game drop boxes.
- ✓ Observe that only authorized members of the drop and count teams have access to drop boxes.
- ✓ Review organizational charts and employee access listings to ensure observed persons having access to drop boxes are authorized members of the drop and count team or persons authorized for the resolution of an emergency.



### Best Practice

Operations generally identify designated staff and other authorized persons in their SICS. A sign-in/out log can also assist when investigating occurrences. Sign-in/out logs commonly include date, time, individual(s) entering/exiting, reason for access, and escort (if applicable).

### 543.17(f): Card game count standards

- (2) The card game count must be performed in a count room or other equivalently secure area with comparable controls.
- (3) Access to the count room during the count must be restricted to members of the drop and count teams, with the exception of authorized observers, supervisors for resolution of problems, and authorized maintenance personnel.



#### Intent

To minimize the risk of misappropriation of funds or other inappropriate activities by ensuring the card games count is performed in a secure area with restricted access.



#### Testing

- ✓ Inquire with drop team personnel to determine if the card game count is performed in a count room or other equivalently secure area with comparable controls and if access to the count room during the card game count is restricted to members of the drop and count teams, with the exception of authorized observers, supervisors for resolution of problems, and authorized maintenance personnel.
- ✓ Observe the count process to determine if the location is appropriate and who is allowed access to the count room during the count.
- ✓ Review organizational charts and employee access listings to determine if persons observed during the count process are authorized.



#### Best Practice

If an area other than the count room is utilized, an operation's SICS typically identifies an alternate secure area. Operations commonly identify designated staff and other authorized persons with access to the count room during the count through their SICS. A sign-in/out log can also assist when investigating occurrences. Sign-in/out logs commonly include date, time, individual(s) entering/exiting, reason for access, and escort (if applicable).

- (4) If counts from various revenue centers occur simultaneously in the count room, procedures must be in effect to prevent the commingling of funds from different revenue centers.



#### Intent

To minimize the risk of misappropriation or commingling of funds from various revenue centers.



#### Testing

- ✓ Review SICS for policies and procedures that address the prevention of commingling of funds from different revenue centers.
- ✓ Inquire with count team personnel to determine if counts from various revenue centers occur simultaneously in the count room and, if so, what procedures are in effect.
- ✓ Observe to verify there is no potential for commingling of funds.



#### Best Practice

Typically, management assigns count members to a specific revenue center and utilizes separate tables or clearly identified areas on a shared table for each revenue center to ensure the counts are not commingled.



- (5) Count equipment and systems must be tested, with the results documented, at minimum before the first count begins to ensure the accuracy of the equipment.



#### Intent

To minimize the risk of misappropriation of funds or other inappropriate activities and ensure that information gathered during the count is accurate and that equipment works as intended.



#### Testing

- ✓ Inquire with count team personnel to determine the process for testing count equipment and systems.
- ✓ Observe testing procedures to determine if results are documented, and testing is conducted prior to beginning the first count to ensure the accuracy of the equipment.
- ✓ Review testing results documentation or other related documentation.



#### Best Practice

Testing procedures should be included in an operation's SICS as the first function of the count process. Generally, the count team obtains test money from the vault, which includes, at a minimum, one strap of each denomination accepted by the currency counter.

## NIGC Drop and Count – 25 CFR 543.17 Toolkit

### 543.17(f): Card game count standards

- (6) The card game drop boxes must be individually emptied and counted so as to prevent the commingling of funds between boxes until the count of the box has been recorded.
  - (i) The count of each box must be recorded in ink or other permanent form of recordation.
  - (ii) For counts that do not utilize a currency counter, a second count must be performed by a member of the count team who did not perform the initial count. Separate counts of chips and tokens must always be performed by members of the count team.



### Intent

To minimize the risk of misappropriation or commingling of funds from various drop boxes before the count has been permanently recorded.



### Testing

- ✓ Inquire with count team personnel to determine the process to prevent the commingling of funds between card game drop boxes until the count of the box has been recorded; what the process is if funds between drop boxes have been commingled; and how the counts are performed and recorded.
- ✓ Observe if the count of each box is recorded in ink or other permanent form of recordation.
- ✓ Observe if a second count is performed by a member of the count team who did not perform the initial count, who records the count.
- ✓ Observe whether a separate, independent count of chips and tokens is always performed by members of the count team.
- ✓ Review job schedules, if possible, for function.



### Best Practice

Generally, as the count team empties drop boxes, a card identifying the box is placed on top of the contents and either separated on the table or a separating mechanism. For example, a clear plastic card could be placed between box contents if they must be stacked together.

Schedules created by drop and count management typically identify the agents' functions for each day to ensure separate counts by different count team members when applicable.

### 543.17(f): Card game count standards

- (6) The card game drop boxes must be individually emptied and counted so as to prevent the commingling of funds between boxes until the count of the box has been recorded.
- (iii) Coupons or other promotional items not included in gross revenue must be recorded on a supplemental document by either the count team members or accounting personnel. All single-use coupons must be cancelled daily by an authorized agent to prevent improper recirculation.



#### Intent

To minimize the risk of misappropriation of funds or other inappropriate activities by ensuring that coupons and other promotional items are recorded correctly and by the appropriate individuals.



#### Testing

- ✓ Inquire with count team personnel to determine the count process for coupons or other promotional items not included in gross revenue and if single-use coupons are used.
- ✓ Observe the recording of coupons or other promotional items not included in gross revenue, the cancellation of coupons (if applicable), and by whom they are cancelled.
- ✓ Examine records for test dates to confirm coupons or other promotional items have been properly recorded and all single-use coupons have been cancelled daily by an authorized agent.
- ✓ Review employee listing for reasonableness of authorized agents.



#### Best Practice

Generally, the agent responsible for recording coupons and cancelling single-use coupons is identified within an operation's SICS. It is best to provide a log for documentation and ensure the timeframe in which single-use coupons must be cancelled is also included in the SICS.

## NIGC Drop and Count – 25 CFR 543.17 Toolkit

### 543.17(f): Card game count standards

- (6) The card game drop boxes must be individually emptied and counted so as to prevent the commingling of funds between boxes until the count of the box has been recorded.
- (iv) If a currency counter interface is used
- (A) It must be restricted to prevent unauthorized access; and
- (B) The currency drop figures must be transferred via direct communications line or computer storage media to the accounting department.



#### Intent

To minimize the risk of misappropriation of funds or other inappropriate activities by ensuring that the currency counter interface has not been tampered with and that only authorized individuals have access.



#### Testing

- ✓ Inquire with count team personnel to determine if a currency counter interface is used, how the currency drop figures are communicated to the accounting department and determine if any testing procedures for the currency counter interface are in place.
- ✓ Observe if a currency counter interface is used and submission of data.
- ✓ Review testing documentation available.
- ✓ Review the authorization list to note who is allowed to use the currency counter interface and the employee listing for the reasonableness of authorized agents.



#### Best Practice

Generally, logical controls to limit access are implemented. IT personnel assign passwords only to appropriate individuals.

## NIGC Drop and Count – 25 CFR 543.17 Toolkit

### 543.17(f): Card game count standards

- (7) If currency counters are utilized, a count team member must observe the loading and unloading of all currency at the currency counter, including rejected currency.
- (8) Two counts of the currency rejected by the currency counter must be recorded per table, as well as in total. Posting rejected currency to a nonexistent table is prohibited.
- (9) Card game drop boxes, when empty, must be shown to another member of the count team, to another agent observing the count, or to surveillance, provided that the count is monitored in its entirety by an agent independent of the count.



#### Intent

To minimize the risk of misappropriation of funds or other inappropriate activities by ensuring that a count team member observes all currency being loaded into the currency counter, that there is an accurate count of rejected currency, that there are proper records for rejected currency, and that no funds are hidden/not counted.



#### Testing

- ✓ Inquire with count team personnel to determine the count process involving currency counters, if utilized, and the treatment of empty card game drop boxes.
- ✓ Observe if a count team member is present for the loading and unloading of all currency at the currency counter, including rejected currency and the procedure used for any rejected currency. If there is no rejected currency, expand test dates and review supporting documentation for rejected currency on a different date.
- ✓ Observe who drop boxes are shown to when empty.
- ✓ Review supporting documentation for rejected currency.



#### Best Practice

Schedules created by drop and count management typically identify the agents' functions for each day. When the SICS is created, a description of each count function detailing specific tasks and responsibilities could be included and functions should coordinate with language utilized on scheduling documents to ensure each agent can clearly determine their assigned duties during the count process.

- (10) Procedures must be implemented to ensure that any corrections to the count documentation are permanent and identifiable, and that the original, corrected information remains legible. Corrections must be verified by two count team agents.



#### Intent

To minimize the risk of misappropriation of funds or other inappropriate activities by ensuring that there is proper documentation for corrections to count paperwork and that at least two count team members agree to the correction.



#### Testing

- ✓ Review TICS and/or SICS to ensure policies and procedures have been implemented that adequately preserve corrections made to the count documentation and provide for verification of corrections by two count team agents.
- ✓ Inquire with count team personnel to determine the process for making corrections to the count documentation.
- ✓ Observe the count process to ensure corrections to the count documentation are permanent and identifiable, that the original, corrected information remains legible, and that corrections are verified by two count team agents. (Review surveillance footage of another count date if no corrections are made during the live observation)
- ✓ Examine records of the count for the test dates to determine that any corrections made to count documentation are appropriately documented.

## NIGC Drop and Count – 25 CFR 543.17 Toolkit

### 543.17(f): Card game count standards

- (11) The count sheet must be reconciled to the total drop by a count team member who may not function as the sole recorder, and variances must be reconciled and documented.
- (12) All count team agents must sign the count sheet attesting to their participation in the count.



#### Intent

To minimize the risk of misappropriation of funds or other inappropriate activities by ensuring that the count sheet is reconciled to the total drop by a count team member who does not function as the sole recorder; variances are reconciled and documented, and all count team agents sign the count sheet attesting to their participation in the count.



#### Testing

- ✓ Observe that the count sheet was reconciled to the total drop by a count team member who did not function as the sole recorder, and variances (if applicable) were reconciled and documented.
- ✓ Confirm that all count team agents signed the count sheet attesting to their participation in the count by comparing signatures to the count team schedule and access logs for the test date.
- ✓ Examine records of the count for the test dates.
- ✓ Review supporting documentation to identify who reconciled the documentation as recorder and as reconciler.
- ✓ Review employee listing.



#### Best Practice

Schedules created by drop and count management typically identify the agents' functions for each day.

## NIGC Drop and Count – 25 CFR 543.17 Toolkit

### 543.17(f): Card game count standards

- (13) A final verification of the total drop proceeds, before transfer to cage/vault, must be performed by at least two agents, one of whom is a supervisory count team member, and one a count team agent.
  - (i) Final verification must include a comparison of currency counted totals against the currency counter/system report, if any counter/system is used.
  - (ii) Any unresolved variances must be documented, and the documentation must remain part of the final count record forwarded to accounting.
  - (iii) This verification does not require a complete recount of the drop proceeds, but does require a review sufficient to verify the total drop proceeds being transferred.



#### Intent

To minimize the risk of misappropriation of funds or other inappropriate activities by ensuring a final verification of the total drop proceeds before transfer to cage/vault is performed by at least two agents, one of whom is a supervisory count team member, and one a count team agent.



#### Testing

- ✓ Inquire with count team personnel to determine the process for final verification before total drop proceeds are transferred to the cage/vault.
- ✓ Observe the final verification to verify who performs it, if it includes a comparison of currency counted totals against the currency counter/system report, if a counter/system is used, if unresolved variances are documented, and if the documentation included with the final count record is forwarded to accounting.
- ✓ Examine records for the test dates for a comparison to the currency counter system.
- ✓ Review employee listing to determine if a supervisory count team member performed the final verification.



#### Best Practice

Schedules created by drop and count management typically identify the agents' daily functions, ensuring that supervisory count team members are assigned appropriate duties to meet requirements.



## NIGC Drop and Count – 25 CFR 543.17 Toolkit

### 543.17(f): Card game count standards

- (13) A final verification of the total drop proceeds, before transfer to cage/vault, must be performed by at least two agents, one of whom is a supervisory count team member, and one a count team agent.
- (iv) The two agents must sign the report attesting to the accuracy of the total drop proceeds verified.
- (v) All drop proceeds and cash equivalents that were counted must be submitted to the cage or vault agent (who must be independent of the count team), or to an agent independent of the revenue generation source and the count process, for verification. The agent must certify, by signature, the amount of the drop proceeds delivered and received. Any unresolved variances must be reconciled, documented, and/or investigated by accounting/revenue audit.



#### Intent

To minimize the risk of misappropriation of funds or other inappropriate activities by ensuring a final verification of the total drop proceeds before transfer to cage/vault is performed by at least two agents, one of whom is a supervisory count team member, and one a count team agent.



#### Testing

- ✓ Inquire with count team personnel to determine if the drop proceeds and cash equivalents that were counted were submitted to a cage or vault agent who is independent of the count team or to an agent independent of the revenue generation source and the count process, for verification, who receives drop proceeds from the count team and certifies the amount of the drop proceeds delivered and/or received.
- ✓ Observe if the two agents who perform the final verification sign the report attesting to the accuracy of the total drop proceeds verified.
- ✓ Examine records for the test dates for signatures of the agents that certify, by signature, the amount of the drop proceeds delivered and received for any investigations or documentation of unresolved variances.
- ✓ Review organizational charts and employee listings to confirm a supervisory count team member performed the final verification and that the agent accepting the funds into cage/vault accountability is independent of the count team and revenue generation source of the funds.



#### Best Practice

If drop proceeds are submitted to an individual other than the cage or vault agent, operations may include prohibitions within their SICS to identify job titles that are not appropriate to accept drop proceeds.

- (14) After verification by the agent receiving the funds, the drop proceeds must be transferred to the cage/vault.
- (i) The count documentation and records must not be transferred to the cage/vault with the drop proceeds.
  - (ii) The cage/vault agent must have no knowledge or record of the drop proceeds total before it is verified.



#### Intent

To minimize the risk of misappropriation of funds or other inappropriate activities by ensuring the funds are in a place in the cage or vault and kept secure location after the count; that the custody of funds and records are kept separate after drop proceeds are transferred to the cage/vault.



#### Testing

- ✓ Inquire with count team and/or cage personnel to determine the verification process of total drop proceeds by the cage/vault agent.
- ✓ Observe if the cage/vault agent has any knowledge of the drop proceeds prior to transfer, if the drop proceeds are transferred to the cage/vault after verification by the agent receiving the funds, and if records are maintained separately from the drop proceeds being transferred to the cage/vault.
- ✓ Review documentation for signatures and compare signatures to those involved during observation of the transfer.



#### Best Practice

Typically, a bulk verification is performed without breaking straps to allow funds to be taken into vault accountability, and then straps can be individually verified as time allows. Signature attestation on straps provides accountability for variances identified within individual straps at a later time.

## NIGC Drop and Count – 25 CFR 543.17 Toolkit

### 543.17(f): Card game count standards

- (14) After verification by the agent receiving the funds, the drop proceeds must be transferred to the cage/vault.
- (iii) All count records must be forwarded to accounting or secured and accessible only by accounting agents.
- (iv) The cage/vault agent receiving the transferred drop proceeds must sign the count sheet attesting to the verification of the total received, and thereby assume accountability of the drop proceeds, ending the count.



#### Intent

To minimize the risk of misappropriation of funds or other inappropriate activities by ensuring that, after verification by the agent receiving the funds, the drop proceeds have been officially transferred and that the accountability of the funds now rests with the cage/vault and thereby ending the count; and that the accounting department is able to review and maintain the documentation for a count.



#### Testing

- ✓ Inquire with count team and/or cage personnel to determine what signature attestation requirements are in place when transferring drop proceeds.
- ✓ Observe if count records are forwarded to accounting or secured and accessible only by accounting agents; if the cage/vault agent receiving the transferred drop proceeds assumes accountability of the funds by signing the count sheet, thereby ending the count.
- ✓ Examine records for the test dates to verify that a cage/vault agent receiving the transferred drop proceeds signs the count sheet.
- ✓ Review employee listing for accounting agents



#### Best Practice

If count records are to be delivered to accounting immediately, the operation's SICS commonly identify an appropriate agent to deliver them, or identify an area accessible only by accounting agents, such as a drop box, for the records to be secured.

## NIGC Drop and Count – 25 CFR 543.17 Toolkit

### 543.17(f): Card game count standards

- (14) After verification by the agent receiving the funds, the drop proceeds must be transferred to the cage/vault.
- (v) Any unresolved variances between total drop proceeds recorded on the count sheet and the cage/vault final verification during transfer must be documented and investigated.



#### Intent

To minimize the risk of misappropriation of funds or other inappropriate activities by ensuring unresolved variances are investigated and documented.



#### Testing

- ✓ Inquire with count team and/or cage personnel to determine the process followed if unresolved variances between total drop proceeds recorded on the count sheet and the cage/vault final verification during transfer exist.
- ✓ Review supporting documentation for unresolved variances between total drop proceeds recorded on the count sheet and the cage/vault final verification during transfer and the investigations, if applicable.

- (15) The count sheet, with all supporting documents, must be delivered to the accounting department by a count team member or an agent independent of the cage/vault. Alternatively, it may be secured so that it is only accessible to accounting agents.



#### Intent

To minimize the risk of misappropriation of funds or other inappropriate activities by ensuring that only the accounting department has access to the count sheet with all supporting documents.



#### Testing

- ✓ Inquire with count team personnel to determine the process of submitting the count sheet, with all supporting documentation, to the accounting department.
- ✓ Observe the delivery of the count sheet, with all supporting documentation, to the accounting department – note who delivers and receives the documentation. If documentation is secured rather than delivered, observe the process of securing the documents.
- ✓ Review employee listings to ensure a count team member delivered documents to the accounting department.
- ✓ If documents are secured rather than delivered, review access permissions to confirm only accounting agents can access the documents.



#### Best Practice

If count records are to be delivered to accounting immediately, an operation's SICS commonly identifies an appropriate agent to deliver records or an area accessible only by accounting agents, such as a drop box, for the records to be secured. If a secure area is utilized, SICS typically define who has access to the area and who will maintain custody of keys/access control.

## 543.17(g): Player interface financial instrument count standards

- (1) Access to stored full financial instrument storage components must be restricted to:
- (i) Authorized members of the drop and count teams; and
  - (ii) In an emergency, authorized persons for the resolution of a problem.



### Intent

To minimize the risk of misappropriation and unauthorized access to financial instrument storage components.



### Testing

- ✓ Observe to verify that only authorized members of the drop and count teams have access to full financial instrument storage.
- ✓ Inquire with drop team management or (if a computerized access system to restrict an area is utilized) information technology personnel to determine who the authorized members are who have access to financial instrument storage components, including for emergency unscheduled access.
- ✓ Review the organizational charts and employee listings to determine the appropriateness of authorization for access.
- ✓ Review access list(s).



### Best Practice

Operations generally identify designated staff and any other authorized persons in their SICS. A sign-in/out log can also assist when investigating occurrences. Sign-in/out logs commonly include date, time, individual(s) entering/exiting, reason for access, and escort (if applicable).

### 543.17(g): Player interface financial instrument count standards

- (2) The player interface financial instrument count must be performed in a count room or other equivalently secure area with comparable controls.
- (3) Access to the count room during the count must be restricted to members of the drop and count teams, with the exception of authorized observers, supervisors for resolution of problems, and authorized maintenance personnel.



#### Intent

To minimize the risk of misappropriation of or unauthorized access to the contents of financial instrument storage components through physical controls and limiting access to only certain individuals.



#### Testing

- ✓ Inquire with count team personnel to determine who is authorized to access the count room during the count.
- ✓ Observe who is allowed access to the count room during the player interface financial instrument count.
- ✓ Review employee listing and count room authorization list.



#### Best Practice

If an area other than the count room is to be utilized, it is best to identify the secure area within an operation's SICS. Operations generally identify designated staff and any other authorized persons with access to the count room during the count through their SICS. A sign-in/out log can also assist when investigating occurrences. Sign-in/out logs commonly include date, time, individual(s) entering/exiting, reason for access, and escort (if applicable).

## NIGC Drop and Count – 25 CFR 543.17 Toolkit

### 543.17(g): Player interface financial instrument count standards

- (4) If counts from various revenue centers occur simultaneously in the count room, procedures must be in effect that prevent the commingling of funds from different revenue centers.
- (5) The count team must not have access to amount-in or bill-in meter amounts until after the count is completed and the drop proceeds are accepted into the cage/vault accountability.



#### Intent

To prevent the commingling of funds from various revenue centers and ensure the accuracy of information from financial instrument storage components count by preventing count bias and potential misappropriation.



#### Testing

- ✓ Observe the count process and verify there is no potential for the commingling of funds from different revenue centers.
- ✓ Inquire with count team personnel to determine when amount-in or bill-in meter amounts can be accessed.
- ✓ Inquire with information technology personnel to determine what, if any, logical controls are in place to restrict access to the amount-in or bill-in meter amounts until after the count is completed and the drop proceeds are accepted into the cage/vault accountability.
- ✓ Observe if the count team is restricted from having access to amount-in or bill-in meter amounts until after the count is completed and the drop proceeds are accepted into the cage/vault accountability. Obtain the schedule of the count, if possible, to learn when access should be allowed, if applicable.



#### Best Practice

Typically, management assigns count members to a specific revenue center and utilizes separate tables or clearly identified areas on a shared table for each revenue center to ensure the counts are not commingled. Online computerized systems are restricted to prevent access to meter amounts.



(6) Count equipment and systems must be tested, and the results documented, before the first count begins, to ensure the accuracy of the equipment.



#### Intent

To ensure that information gathered during the count is accurate and that equipment works as intended.



#### Testing

- ✓ Inquire with count team personnel to determine the testing process of count equipment and systems.
- ✓ Observe testing of count equipment and systems to ensure results are documented, and testing is completed prior to beginning the first count to ensure the accuracy of the equipment.
- ✓ Obtain testing documentation to verify testing results are documented.



#### Best Practice

Testing procedures can be included in an operation's SICS as the first function of the count process. Generally, the Count Team obtains test money from the vault, which includes, at a minimum, one strap of each denomination accepted by the currency counter.

## NIGC Drop and Count – 25 CFR 543.17 Toolkit

### 543.17(g): Player interface financial instrument count standards

(7) If a currency counter interface is used:

- (i) It must be adequately restricted to prevent unauthorized access; and
- (ii) The currency drop figures must be transferred via direct communications line or computer storage media to the accounting department.



#### Intent

To ensure that the currency counter interface has not been tampered with and that only authorized individuals have access.



#### Testing

- ✓ Inquire with count team personnel to determine if a currency counter interface is used; and how the currency drop figures are communicated to the accounting department.
- ✓ Observe if count data is transferred using a currency counter interface.
- ✓ Review the documentation for information transferred.
- ✓ Review the authorization list to note who is allowed to use the currency counter interface and the employee listing for reasonableness of authorized agents.



#### Best Practice

Generally, logical controls are implemented to limit access. IT personnel assign passwords only to appropriate individuals based on authorization levels.

## NIGC Drop and Count – 25 CFR 543.17 Toolkit

### 543.17(g): Player interface financial instrument count standards

- (8) The financial instrument storage components must be individually emptied and counted so as to prevent the commingling of funds between storage components until the count of the storage component has been recorded.
- (i) The count of each storage component must be recorded in ink or other permanent form of recordation.
  - (ii) Coupons or other promotional items not included in gross revenue may be recorded on a supplemental document by the count team members or accounting personnel. All single-use coupons must be cancelled daily by an authorized agent to prevent improper recirculation.



#### Intent

To prevent the commingling of funds between various financial instrument storage components and to ensure the accuracy of information from the player interfaces.



#### Testing

- ✓ Inquire with count team personnel to determine the process to prevent the commingling of funds between boxes until the count of the box has been recorded, what the process is if funds between drop boxes have been commingled, and how the counts are performed and recorded.
- ✓ Inquire with count team personnel to determine the count process for coupons or other promotional items not included in gross revenue and if single-use coupons are used. Observe the process for emptying and counting drop boxes.
- ✓ Observe if the count of each storage component is recorded in ink or other permanent form of recordation.
- ✓ Observe the recording of coupons or other promotional items not included in gross revenue and cancellation of single-use coupons (if applicable) and by whom they are cancelled.
- ✓ Examine records for test dates to confirm coupons or other promotional items have been properly recorded, and all single-use coupons have been cancelled daily by an authorized agent.



#### Best Practice

Generally, as the count team empties drop boxes, a card identifying the box is placed on top of the contents and either separated on the table or a separating mechanism. For example, a clear plastic card could be placed between box contents if they must be stacked together.

## NIGC Drop and Count – 25 CFR 543.17 Toolkit

### 543.17(g): Player interface financial instrument count standards

- (9) If currency counters are utilized, a count team member must observe the loading and unloading of all currency at the currency counter, including rejected currency.
- (10) Two counts of the currency rejected by the currency counter must be recorded per interface terminal as well as in total. Rejected currency must be posted to the player interface from which it was collected.



#### Intent

To ensure that a count team member sees all currency being loaded into the currency counter, to decrease the possibility of misappropriation of currency. To help ensure an accurate count is conducted and ensure a recording of rejected currency is conducted.



#### Testing

- ✓ Inquire with count team personnel to determine the count process involving currency counters, if utilized.
- ✓ Observe if a count team member is present for the loading and unloading of all currency at the currency counter, including rejected currency and the procedure used for any rejected currency. If there is no rejected currency, expand test dates and review supporting documentation for rejected currency on a different date.
- ✓ Review supporting documentation for rejected currency.



#### Best Practice

The SICS typically contains a written description of each count function detailing specific tasks and responsibilities. Functions should coordinate with language utilized on scheduling documents to ensure each agent can clearly determine their assigned duties during the count process, ensuring currency loading/unloading is observed.

(11) Storage components, when empty, must be shown to another member of the count team, to another agent who is observing the count, or to surveillance, provided that the count is monitored in its entirety by an agent independent of the count.



#### Intent

To ensure that funds are not hidden, prevent inappropriate activity, and ensure that all funds are counted.



#### Testing

- ✓ Inquire with count team personnel to determine the treatment of empty storage components drop boxes.
- ✓ Observe the count process and verify if storage components are shown to another count team member, observing agent, or surveillance when emptied.



#### Best Practice

The SICS typically contains a written description of each count function detailing specific tasks and responsibilities. Functions should coordinate language utilized on scheduling documents to ensure each agent can clearly determine their assigned duties during the count process. The SICS should define if a count team agent or surveillance is responsible for ensuring storage components are confirmed empty.

(12) Procedures must be implemented to ensure that any corrections to the count documentation are permanent, identifiable and the original, corrected information remains legible. Corrections must be verified by two count team agents.



#### Intent

To ensure that there is proper documentation of corrections on count paperwork; corrections are permanent and identifiable, and original information remains legible.



#### Testing

- ✓ Review TICS and/or SICS to verify policies and procedures have been implemented that adequately preserve corrections made to the count documentation and provide for verification of corrections by two count team agents.
- ✓ Inquire with count team personnel to determine the process for making corrections to the count documentation.
- ✓ Observe the count process to ensure corrections to the count documentation are permanent and identifiable, that the original, corrected information remains legible, and that corrections are verified by two count agents. (Review surveillance footage of another count date if no corrections were made during the live observation.)
- ✓ Examine records for the count for the test dates to determine that any corrections made to count documentation are appropriately documented.

(13) The count sheet must be reconciled to the total drop by a count team member who may not function as the sole recorder, and variances must be reconciled and documented. This standard does not apply to vouchers removed from the financial instrument storage components.



#### Intent

To ensure there is a reconciliation of count documentation to physical funds and documentation of all count variances to reduce the risk of fraud or other inappropriate activity.



#### Testing

- ✓ Observe if the count sheet is reconciled to the total drop by a count team member who does not function as the sole recorder and note if any variances were discovered.
- ✓ Review supporting documentation to determine who reconciles the documentation as recorder and reconciler.
- ✓ Examine records of the count for the test dates for documentation of variances (if applicable).



#### Best Practice

Typically, in the SICS a description of each count function detailing specific tasks and responsibilities is included. Functions should coordinate with language utilized on scheduling documents to ensure each agent can clearly determine their assigned duties during the count process.

## NIGC Drop and Count – 25 CFR 543.17 Toolkit

### 543.17(g): Player interface financial instrument count standards

(14) All count team agents must sign the report attesting to their participation in the count.



#### Intent

To ensure accountability and that all count team members are aware of and agree to the information presented in the count. To document the individuals present for the count if, there is an investigation.



#### Testing

- ✓ Observe if all count team agents sign the report attesting to their participation in the count.
- ✓ Examine records for the count for the test dates to verify count team agents signed the count sheet. The signatures are an attestation to their participation in the count.
- ✓ Confirm that all count team agents signed the count sheet by comparing signatures to the count team schedule and access logs for the test dates.



## NIGC Drop and Count – 25 CFR 543.17 Toolkit

### 543.17(g): Player interface financial instrument count standards

- (15) A final verification of the total drop proceeds, before transfer to cage/vault, must be performed by at least two agents, one of whom is a supervisory count team member and the other a count team agent.
- (i) Final verification must include a comparison of currency counted totals against the currency counter/system report, if a counter/system is used.
  - (ii) Any unresolved variances must be documented and the documentation must remain a part of the final count record forwarded to accounting.
  - (iii) This verification does not require a complete recount of the drop proceeds but does require a review sufficient to verify the total drop proceeds being transferred.
  - (iv) The two agents must sign the report attesting to the accuracy of the total drop proceeds verified.
  - (v) All drop proceeds and cash equivalents that were counted must be turned over to the cage or vault cashier (who must be independent of the count team) or to an agent independent of the revenue generation and the count process for verification. Such cashier or agent must certify, by signature, the amount of the drop proceeds delivered and received. Any unresolved variances must be reconciled, documented, and/or investigated by accounting/revenue audit.



#### Intent

To ensure the accuracy of count data and prevent one agent from posting errors or other incorrect information to count paperwork without review by at least one other agent. To ensure all variances are reconciled or investigated.



#### Testing

- ✓ Review TICS and/or SICS to verify policies and procedures have been established for total drop verifications performed by two agents.
- ✓ Inquire with count team personnel to determine the process for final verification before total drop proceeds are transferred to the cage/vault.
- ✓ Inquire with count team and/or cage personnel to determine what signature attestation requirements are in place when transferring drop proceeds.

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#### Best Practice

Typically, a bulk verification is performed without breaking straps to allow funds to be taken into vault accountability; then straps can be individually verified as time allows. Signature attestation on straps provides accountability for variances identified within individual straps at a later time.

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#### Testing (con't)

- ✓ Observe the final verification to verify who performs it, if it includes a comparison of currency counted totals against the currency counter/system report, if a counter/system is used, if unresolved variances are documented, and if the documentation included with the final count record is forwarded to accounting.
- ✓ Observe if the two agents who perform the final verification sign the report attesting to the accuracy of the total drop proceeds verified.
- ✓ Observe who receives the drop proceeds and cash equivalents that were counted and who verifies the count.
- ✓ Examine records for the test dates for the signatures of the two agents who performed the final verification, attesting to the accuracy of the total drop proceeds.
- ✓ Verify that a cage/vault agent receiving the transferred drop proceeds signs the count sheet.
- ✓ Review organizational chart and employee listing to confirm a supervisory count team member performed the final verification and that the agent accepting the funds into cage/vault accountability is independent of the count team and revenue generation source of the funds.



#### Best Practice (con't)

If drop proceeds are submitted to an individual other than the cage or vault agent, operations may include prohibitions within their SICS to identify job titles that are not appropriate to accept drop proceeds.

### 543.17(g): Player interface financial instrument count standards

- (16) After certification by the agent receiving the funds, the drop proceeds must be transferred to the cage/vault.
- (i) The count documentation and records must not be transferred to the cage/vault with the drop proceeds.
  - (ii) The cage/vault agent must not have knowledge or record of the drop proceeds total before it is verified.
  - (iii) All count records must be forwarded to accounting secured and accessible only by accounting agents.
  - (iv) The cage/vault agent receiving the transferred drop proceeds must sign the count sheet attesting to the verification of the total received, and thereby assuming accountability of the drop proceeds, and ending the count.
  - (v) Any unresolved variances between total drop proceeds recorded on the count room report and the cage/vault final verification during transfer must be documented and investigated.



#### Intent

To ensure that the custody of funds and records is kept separate after drop proceeds are transferred to the cage/vault; to help prevent inappropriate activity or manipulation of count data.



#### Testing

- ✓ Observe if count documentation and records are maintained separately from the drop proceeds being transferred to the cage/vault.
- ✓ Inquire with count team personnel to determine if the cage/vault agent verifies the drop proceeds without having prior knowledge or record of the total drop proceeds.
- ✓ Observe if the cage/vault agent has any knowledge of the drop proceeds by checking if the agent is present during the regular count or viewing the paperwork prior to the verification.
- ✓ Inquire with count team and/or cage personnel to determine the process for submitting records to accounting.
- ✓ Observe if count records are forwarded to accounting or secured and accessible only by accounting agents.
- ✓ Observe who picks up accounting records if applicable.

*(continued next page)*



#### Best Practice

Typically, a blind count is performed by the cage/vault agent and recorded on a transfer form. After verification, the transfer form can then be compared to the count sheet to determine if a variance exists.



#### Testing (con't)

- ✓ Observe if the cage/vault agent receiving the transferred drop proceeds assumes accountability of the funds by signing the count sheet, thereby ending the count.
- ✓ Examine documentation for the test dates to verify that the cage/vault agent receiving the transferred drop proceeds signs the count sheet.
- ✓ Inquire with count team and/or cage personnel to determine if unresolved variances between total drop proceeds recorded on the count sheet and the cage/vault final verification during transfer are documented and investigated.
- ✓ Review supporting documentation and investigations regarding unresolved variances between total drop proceeds recorded on the count sheet and the cage/vault final verification during the transfer.

(17) The count sheet, with all supporting documents, must be delivered to the accounting department by a count team member or agent independent of the cashiers department. Alternatively, it may be adequately secured and accessible only by accounting department.



#### Intent

To restrict access to count documentation to the accounting department after the count process is completed. To ensure that a person with custody of the funds does not have access to change count information.



#### Testing

- ✓ Inquire with the count team and/or cage personnel to determine the process of submitting the count sheet, with all supporting documentation, to the accounting department.
- ✓ Observe the delivery, or secured and restricted storage, of the count sheet, with all supporting documentation being delivered to the accounting department – note who delivers and receives the documentation.
- ✓ Review employee listing to ensure a count team member delivers documents to the accounting department.
- ✓ If documents are secured rather than delivered, review access permissions to confirm only accounting agents can access the documents.



#### Best Practice

If count records are to be delivered to accounting immediately, operations generally identify within their SICS an appropriate agent to deliver them and ensure the security of paperwork by transporting it in packaging such as tamper-proof bags or identifying an area accessible only by accounting agents, such as a drop box, for the records to be secured. If a secure area is utilized, define who has access to the area and who will maintain custody of the key/access control.

## 543.17(h): Collecting currency cassettes and financial instrument storage components from kiosks

Controls must be established, and procedures implemented to ensure that currency cassettes and financial instrument storage components are securely removed from kiosks. Such controls must include the following:

- (1) Surveillance must be notified prior to the financial instrument storage components or currency cassettes being accessed in a kiosk.
- (2) At least two agents must be involved in the collection of currency cassettes and/or financial instrument storage components from kiosks and at least one agent should be independent of kiosk accountability.
- (3) Currency cassettes and financial instrument storage components must be secured in a manner that restricts access to only authorized agents.



### Intent

To minimize the risk of theft of currency cassettes and to ensure an independent department is aware of the collection of currency cassettes.



### Testing

- ✓ Review TICS and/or SICS to verify policies and procedures have been established for the security of kiosk currency cassettes.
- ✓ Inquire with count team and/or cage personnel to determine if surveillance is notified when instrument storage components or currency cassettes are being accessed so that surveillance may monitor the activities.
- ✓ Observe the notification of surveillance.
- ✓ Inquire with count team and/or cage personnel to determine if at least two agents are involved in the collection of the currency cassettes and/or financial instrument storage components from kiosks with at least one agent independent of kiosk accountability.
- ✓ Observe if at least two agents are involved in the collection.
- ✓ Review employee listing to verify that at least one individual involved in the removal is independent.
- ✓ Observe if currency cassettes and financial instrument storage components are secured in a manner that restricts access to only authorized agents.
- ✓ Inquire with the count team and/or cage personnel to determine the authorized members who have access.

## NIGC Drop and Count – 25 CFR 543.17 Toolkit

### 543.17(h): Collecting currency cassettes and financial instrument storage components from kiosks

Controls must be established and procedures implemented to ensure that currency cassettes and financial instrument storage components are securely removed from kiosks. Such controls must include the following:

- (4) Redeemed vouchers and pull tabs (if applicable) collected from the kiosk must be secured and delivered to the appropriate department (cage or accounting) for reconciliation.



#### Intent

To minimize the risk of misappropriation of redeemed vouchers/pull tabs (if applicable); to ensure they are secured and delivered to the appropriate department for reconciliation.



#### Testing

- ✓ Inquire with count team and/or cage personnel to determine if redeemed vouchers and pull tabs (if applicable) collected from the kiosk are secured and delivered to the appropriate department (cage or accounting) for reconciliation.
- ✓ Observe if redeemed vouchers and pull tabs (if applicable) collected from the kiosk are secured and delivered to the appropriate department (cage or accounting) for reconciliation.
- ✓ Review supporting documentation such as logs or reconciliation.



#### Best Practice

Operations generally identify within their SICS the appropriate department responsible for the reconciliation of redeemed vouchers/pull tabs. If delivered by the count team, ensure the security of paperwork by transporting it in packaging such as tamper-proof bags or identify a secure area accessible only by the responsible department, such as a drop box to deposit the redeemed vouchers/pull tabs. If a secure area is utilized, define who has access to the area and who will maintain custody of the key/access control.

## NIGC Drop and Count – 25 CFR 543.17 Toolkit

### 543.17(h): Collecting currency cassettes and financial instrument storage components from kiosks

Controls must be established and procedures implemented to ensure that currency cassettes and financial instrument storage components are securely removed from kiosks. Such controls must include the following:

- (5) Controls must be established and procedures implemented to ensure that currency cassettes contain the correct denominations and have been properly installed.



#### Intent

To minimize the risk of loading incorrect amounts in currency cassettes, reduce the potential loss of funds due to human error and to provide for accurate kiosk transactions.



#### Testing

- ✓ Review TICS and/or SICS to verify policies and procedures have been established for the accuracy of kiosk currency denominations.
- ✓ Inquire with the count team and/or cage personnel to determine if controls are established and procedures are implemented to ensure that currency cassettes contain the correct denominations and have been properly installed.
- ✓ Observe if controls are established and procedures are implemented to ensure that currency cassettes contain the correct denominations and have been properly installed.



## 543.17(i): Kiosk count standards

(1) Access to stored full kiosk financial instrument storage components and currency cassettes must be restricted to:

- (i) Authorized agents; and
- (ii) In an emergency, authorized persons for the resolution of a problem.



### Intent

To minimize the risk of misappropriation and unauthorized access to financial instrument storage components for kiosks.



### Testing

- ✓ Observe if only authorized agents have access to stored full financial instrument storage components.
- ✓ Inquire with count team and/or cage personnel to determine who the agents are with authorized access to financial instrument storage components, including for emergency unscheduled access.
- ✓ Review the organizational charts and employee listings to determine the appropriateness of authorization for access.



### Best Practice

Operations generally identify designated staff and any other authorized persons through their SICS. A sign-in/out log can also assist when investigating occurrences. Sign-in/out logs commonly include date, time, individual(s) entering/exiting, reason for access, and escort (if applicable). Many operations also implement logical controls, such as restricting physical access to any area where full kiosk financial instrument storage components and currency cassettes are stored through an access control system.

### 543.17(i): Kiosk count standards

- (2) The kiosk count must be performed in a secure area, such as the cage or count room.
- (3) If counts from various revenue centers and kiosks occur simultaneously in the count room, procedures must be in effect that prevent the commingling of funds from the kiosks with any revenue centers.



#### Intent

To minimize the risk of misappropriation or unauthorized access to the contents of a financial instrument storage components with physical controls. To prevent the commingling of funds.



#### Testing

- ✓ Review TICS and/or SICS for policies and procedures that address the prevention of commingling of funds from different revenue centers.
- ✓ Inquire with count team personnel to determine if counts from various revenue centers occur simultaneously in the count room and, if so, what procedures are in effect.
- ✓ Observe if the kiosk count is performed in a secure area such as the cage or count room and determine if there is potential for commingling of funds.



#### Best Practice

Typically, when counting funds from various revenue centers simultaneously, management assigns count members to a specific revenue center and utilizes separate tables or clearly identified areas on a shared table for each revenue center to ensure the counts are not commingled.

### 543.17(i): Kiosk count standards

- (4) The kiosk financial instrument storage components and currency cassettes must be individually emptied and counted so as to prevent the commingling of funds between kiosks until the count of the kiosk contents has been recorded.
- (i) The count of each box must be recorded in ink or other permanent form of recordation.
  - (ii) Coupons or other promotional items not included in gross revenue (if any) may be recorded on a supplemental document. All single-use coupons must be cancelled daily by an authorized agent to prevent improper recirculation.



### Intent

To prevent the commingling of funds from various financial instrument storage components and currency cassettes and ensure the accuracy of the information from financial instrument storage components and player interfaces. To prevent tampering or changing of the count documentation.



### Testing

- ✓ Inquire with count team and/or cage personnel to determine the process to prevent the commingling of funds between kiosks until the count of the kiosk contents has been recorded, what the process is if funds between drop boxes have been commingled, and how the counts are performed and recorded.
- ✓ Inquire with count team personnel to determine the count process for coupons or other promotional items not included in gross revenue, how coupons are recorded, and if single-use coupons are used.
- ✓ Observe the process for counting financial instrument storage components and if the count of each storage component is recorded in ink or other permanent form of recordation.
- ✓ Observe the recording of coupons or other promotional items not included in gross revenue, the cancellation of coupons (if applicable), and by whom they are cancelled.
- ✓ Examine records for test dates to confirm coupons or other promotional items have been properly recorded, and all single-use coupons have been cancelled daily by an authorized agent.
- ✓ Review employee listing for reasonableness of authorized agents.



### Best Practice

Generally, as the count team empties kiosk financial instrument storage components and currency cassettes, a card identifying the box/cassette is placed on top of the contents and either separated on the table or a separating mechanism. For example, a clear plastic card could be placed between box contents if they must be stacked together.

- (5) Procedures must be implemented to ensure that any corrections to the count documentation are permanent, identifiable, and the original, corrected information remains legible. Corrections must be verified by two agents.



#### Intent

To ensure that there is proper documentation of corrections, corrections are permanent and identifiable, and the original information remains legible on count paperwork.



#### Testing

- ✓ Review TICS and/or SICS to ensure policies and procedures have been established that adequately preserve corrections made to the count documentation and provide for verification of corrections by two count team agents.
- ✓ Inquire with count team personnel to determine the process for making corrections to the count documentation.
- ✓ Observe the count process to ensure corrections to the count documentation are permanent and identifiable, that the original, corrected information remains legible, and that corrections are verified by two count team agents. (Review surveillance footage of another count date if no corrections are made during the live observation)
- ✓ Examine count records for the test dates to determine whether any corrections made to count documentation are appropriately documented.

## 543.17(j): Controlled keys

Controls must be established and procedures implemented to safeguard the use, access, and security of keys in accordance with the following:

- (1) Each of the following requires a separate and unique key lock or alternative secure access method:
  - (i) Drop cabinet;
  - (ii) Drop box release;
  - (iii) Drop box content; and
  - (iv) Storage racks and carts used for the drop.



### Intent

To minimize the risk of misappropriation through unauthorized access during the drop. To ensure the keys to the drop are secure.



### Testing

- ✓ Review TICS and/or SICS to verify policies and procedures have been established for the security of controlled keys.
- ✓ Inquire with personnel responsible for installing locks and/or key custodian to determine if the drop cabinet, drop box release, drop box content, and storage racks and carts used for the drop require a separate and unique key lock or alternative secure access method.
- ✓ Observe the security of the drop cabinet keys, drop box release, drop box content, and storage racks and carts used for the drop.



### Best Practice

Generally, operations utilize a unique key lock for the items listed. SICS typically identify what department will install locks and maintain custody of extra locks for repairs. In addition, the custodial department typically implements an inventory tracking and storage system to ensure locks are stored in a manner that prevents commingling and secures them to prevent unauthorized access to sensitive locks.

### 543.17(j): Controlled keys

Controls must be established and procedures implemented to safeguard the use, access, and security of keys in accordance with the following:

- (2) Access to and return of keys or equivalents must be documented with the date, time, and signature or other unique identifier of the agent accessing or returning the key(s).
  - (i) For Tier A and B operations, at least two (2) drop team agents are required to be present to access and return keys. For Tier C operations, at least three (3) drop team agents are required to be present to access and return keys.
  - (ii) For Tier A and B operations, at least two (2) count team agents are required to be present at the time count room and other count keys are issued for the count. For Tier C operations, at least three (two for card game drop box keys in operations with three tables or fewer) count team agents are required to be present at the time count room and other count keys are issued for the count.



#### Intent

To minimize the risk of misappropriation or unauthorized access of keys by ensuring the access and return of keys are logged with the date, time, and signature or other unique identifier of the agent accessing or returning the key(s). To ensure the appropriate number of count team members are present to access and return keys for the drop and count.



#### Testing

- ✓ Review TICS and/or SICS to verify policies and procedures have been established for the security of drop and count keys.
- ✓ Inquire with key custodian personnel to determine the process of accessing and returning keys.
- ✓ Inquire with drop/count team personnel to determine the keys' location.
- ✓ Observe the access to and return of keys.
- ✓ Observe if the appropriate number of drop and count team members are present.
- ✓ Examine key access and return documentation for the test dates selected to determine if the date, time, and signature or other unique identifier of the agent accessing or returning the key(s) is documented.



#### Best Practice

Typically, management defines the number of agents required to access or return keys and the department that will maintain custody of keys within the SICS. When possible, operations utilize a computerized key box, which can be programmed to require the appropriate number of authorized users to be present to access or return keys. In the absence of a computerized key box, or when there is a need to manually issue keys (e.g., due to key box malfunction), a manual log is implemented to document required information as well as document the individual issuing or accepting return of the key(s).

## NIGC Drop and Count – 25 CFR 543.17 Toolkit

### 543.17(j): Controlled keys

Controls must be established and procedures implemented to safeguard the use, access, and security of keys in accordance with the following:

(3) Documentation of all keys, including duplicates, must be maintained, including:

- (i) Unique identifier for each individual key;
- (ii) Key storage location;
- (iii) Number of keys made, duplicated, and destroyed; and
- (iv) Authorization and access.



#### Intent

To ensure documentation of keys is maintained for the accountability and identity of all controlled keys, including duplicates.



#### Testing

- ✓ Review TICS and/or SICS to ensure inventory control and access control procedures for keys are in place.
- ✓ Inquire with key custodian personnel to determine the inventory tracking process for keys.
- ✓ Inquire with key custodian and/or personnel responsible for maintaining electronic key box access to determine if there is documentation of the authorization and access for all controlled keys.
- ✓ Review supporting documentation, such as key logs, invoices, and destruction records, to determine if there is documentation of the number of keys made or ordered, duplicated, and destroyed, unique identifiers, and storage location.
- ✓ Review supporting documentation for authorization and access of all controlled keys.



#### Best Practice

Management generally implements a key inventory process and a permissions list (by job title) to document required information. Performing regular reviews ensures missing or unauthorized accessed keys are easily identified.

### 543.17(j): Controlled keys

Controls must be established and procedures implemented to safeguard the use, access, and security of keys in accordance with the following:

- (4) Custody of all keys involved in the drop and count must be maintained by a department independent of the count and the drop agents as well as those departments being dropped and counted.



#### Intent

To minimize the risk of improper access of drop and count keys by agents that perform the drop and the departments that are dropped and counted.



#### Testing

- ✓ Review TICS and/or SICS to verify policies and procedures have been established to include department independence for custody of all keys involved with the drop and count.
- ✓ Inquire with drop/count team personnel to determine who the assigned key custodian is.
- ✓ Observe who has custody of all keys involved in the drop and count.
- ✓ Review organizational charts and employee listing to determine if the custody of drop and count keys is maintained by a department independent of the count and the drop agents as well as those departments being dropped and counted.



#### Best Practice

A custodial department is typically identified within an operation's SICS, usually Security, and most often, a specific staff member is designated as the key custodian by management.



## NIGC Drop and Count – 25 CFR 543.17 Toolkit

### 543.17(j): Controlled keys

Controls must be established and procedures implemented to safeguard the use, access, and security of keys in accordance with the following:

- (5) Other than the count team, no agent may have access to the drop box content keys while in possession of storage rack keys and/or release keys.
- (6) Other than the count team, only agents authorized to remove drop boxes are allowed access to drop box release keys.
- (7) Any use of keys at times other than the scheduled drop and count must be properly authorized and documented.



#### Intent

To minimize the risk of unauthorized access to funds by limiting access to drop box content keys and drop box release keys while in possession of storage rack keys and/or release keys.



#### Testing

- ✓ Review TICS and/or SICS to determine if proper access control permissions and restrictions are implemented for drop and count keys.
- ✓ Inquire with key custodian personnel to determine what restrictions, if any, regarding access to drop and count keys are in place.
- ✓ Inquire with key custodian personnel to determine who is allowed access to drop box release keys.
- ✓ Inquire with key custodian personnel to determine if any use of keys at times other than the scheduled drop and count is properly authorized and documented.
- ✓ Observe who has custody of keys during the drop and count process and verify access is properly restricted to determine if access to the drop box content keys while in possession of storage rack keys and/or release keys is prohibited for individuals other than the count team.
- ✓ Review the access/permissions listing and compare it to the employee listing to determine if person(s) granted access to drop and count keys are appropriate.



#### Best Practice

Typically, management defines the number of agents required to access or return keys and the department that will maintain custody of keys within the SICS. When possible, operations utilize a computerized key box, which can be programmed to require the appropriate number of authorized users to be present to access or return keys. In the absence of a computerized key box, or when there is a need to manually issue keys (e.g., due to key box malfunction), a manual log is implemented to document required information as well as document the individual issuing or accepting return of the key(s).

## NIGC Drop and Count – 25 CFR 543.17 Toolkit

### 543.17(j): Controlled keys

Controls must be established and procedures implemented to safeguard the use, access, and security of keys in accordance with the following:

- (8) Emergency manual keys, such as an override key, for computerized, electronic, and alternative key systems must be maintained in accordance with the following:
  - (i) Access to the emergency manual key(s) used to access the box containing the player interface drop and count keys requires the physical involvement of at least three agents from separate departments, including management. The date, time, and reason for access, must be documented with the signatures of all participating persons signing out/in the emergency manual key(s);
  - (ii) The custody of the emergency manual keys requires the presence of two agents from separate departments from the time of their issuance until the time of their return; and
  - (iii) Routine physical maintenance that requires access to the emergency manual key(s), and does not involve accessing the player interface drop and count keys, only requires the presence of two agents from separate departments. The date, time, and reason for access must be documented with the signatures of all participating agents signing out/in the emergency manual key(s).



#### Intent

To minimize the risk of unauthorized access to funds by limiting access to the emergency manual key(s) that access the box containing the player interface drop and count keys.



#### Testing

- ✓ Review TICS and/or SICS to determine if proper access control permissions and restrictions are implemented for drop and count emergency keys.
- ✓ Inquire with key custodian and drop/count personnel to determine if the physical involvement of at least three agents from separate departments, including management, is required to access the emergency manual key(s) used to access the box containing the player interface drop and count keys.
- ✓ Inquire with key custodian and drop/count personnel to determine if the date, time, and reason for access are documented with the signatures of all participating persons signing out/in the emergency manual key(s).

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#### Best Practice

Typically, a log is implemented to document the date, time, and reason for access with signature attestation. Including the department and job title on the log ensures confirmation of the involvement of multiple departments and management.



#### Testing (con't)

- ✓ Examine records for selected test dates; if needed, expand the test period to include an access of emergency manual key(s).
- ✓ Inquire with key custodian and drop/count personnel to determine if custody of the emergency manual keys requires the presence of two agents from separate departments from the time of their issuance until the time of their return.
- ✓ Inquire with key custodian and drop/count personnel to determine if the presence of at least two agents from separate departments is required for routine physical maintenance that does not involve accessing the drop and count keys.

### 543.17(j): Controlled keys

Controls must be established and procedures implemented to safeguard the use, access, and security of keys in accordance with the following:

(9) Controls must be established and procedures implemented to safeguard the use, access, and security of keys for kiosks.



#### Intent

To ensure that policies and procedures are established and implemented to safeguard the use, access, and security of keys for kiosks.



#### Testing

- ✓ Review TICS and/or SICS to ensure controls have been established and procedures implemented to grant reasonable access to and provide security for kiosk keys.
- ✓ Examine records for selected test dates to see who accessed kiosk keys. Compare these records to permissions listing and employee listing to determine if users are authorized.



#### Best Practice

When possible, operations utilize a computerized key box that can be programmed to allow access to specific keys by authorized users only. In the absence of a computerized key box, or when there is a need to manually issue keys (e.g., due to key box malfunction), a manual log is implemented to document required information as well as document the individual issuing or accepting return of the key(s).

## 543.17(k): Variances

The operation must establish, as approved by the TGRA, the threshold level at which a variance must be reviewed to determine the cause. Any such review must be documented.



### Intent

To provide for a gaming operation established threshold level, approved by the TGRA, at which variance(s) must be reviewed to determine the cause with the review documented.



### Testing

- ✓ Review TICS and/or SICS for variance threshold level(s) or percentage(s).
- ✓ Review TGRA approval of variance threshold(s).
- ✓ Review supporting documentation of reviews performed for variance(s) exceeding the established threshold(s).



### Best Practice

The approved variance threshold level and documentation expectations are generally detailed within the SICS. The department responsible for reviewing variances and who to report the results of the review is typically included in the SICS.