



**STATE OF WASHINGTON
GAMBLING COMMISSION**

"Protect the Public by Ensuring that Gambling is Legal and Honest"

Dear House-Banked Card Room Applicant:

RE: Preparation and Submission of Internal Controls

Included in this packet is the internal control template outlining information you are required to submit to your local field agent.

The internal control packet is divided into different sections with each section covering the controls for various departments. This will allow for efficient use of your internal controls. For example, as part of the training for cage employees, a copy of the Cashier's Cage section should be given to each cage employee and discussed thoroughly with him/her, along with the applicable WAC rules.

All information requested in the table of contents will be submitted to the Special Agent assigned to complete your review. The internal control packet must be completed and submitted as scheduled by the Special Agent.

Please contact the Special Agent assigned to your review if you have any questions on this process.

Lacey Headquarters..... (360) 486-3440
or (800) 345-2529
Spokane..... (509) 325-7900

Attachment

**P.O. Box 42400, Olympia, WA 98504 | (360) 486-3440
901 N. Monroe St., Suite 240, Spokane, WA 99201 | (509) 325-7900
wsgc.wa.gov**

INTERNAL CONTROLS
HOUSE-BANKED CARD GAMES

(Licensee Name)

(Date of Submission)

(Signature of CEO)

T A B L E O F C O N T E N T S

ADMINISTRATION

Include the following information in the Administration section of your Internal Controls

- **Organization Chart** – *Include your organization chart. (Include Management Company if used or include a separate organization chart for the management company.) It is not necessary to include the names of the specific individuals on the organization chart.*
- **Job Descriptions** –
 - *Include job descriptions for all managerial positions requiring licensure.*
 - *Provide a separate listing that includes the name and title of officers, managers and department heads.*
- **Hours of Operation** – *Include your hours of operation and any approval for extended hours.*
- **Card Games** –
 - *Include card games you will play and the number of tables of each game. If applicable, identify each progressive or bonus jackpot game. Include non-house banked games.*
- **Key Control** – *Document in your internal controls how you will keep keys or combinations to each key control box secure.*
- *Include your key chart matrix which shows:*
 - *Where each key box is maintained;*
 - *Which keys are maintained in each box; and*
 - *Who has access to the boxes and keys.*
 - *You must also include keys associated with the operation of non-house-banked card games.*

ACCOUNTING DEPARTMENT

Include the following information in the Accounting section of your Internal Controls:

- **Bank Account for Prize funds** – *Include the following:*
 - *Name and location of the bank where the prize account will be maintained;*
 - *If the account is interest bearing; and*
 - *Signers on the bank account.*

- **Tip Procedures** – *Include your procedures for the accountability and distribution of tips. Your procedures must include at least the following:*
 - *Whether tips are pooled or retained by employees.*
 - *If you require tips to be pooled include the following:*
 - *Method for allocating tips among employees;*
 - *Procedures for counting and recording of chips received as tips; and*
 - *Procedures for payment of tip income.*
 - *Procedures for the accounting of tips received by authorized card room employees, to include the manner and time frame in which card room employees are required to report their tip income to their employer.*

CASHIER'S CAGE

Include the following information in the Cage section of your Internal Controls

- **NSF Checks** – *Include your NSF check procedures. Your procedures must include at least the following:*
 - *The job position responsible for receiving checks returned NSF;*
 - *The job position responsible for maintaining the NSF check log;*
 - *The job position authorized to write off NSF checks and criteria used to determine when a check maybe written off;*
- **Automated Teller Machines (ATM)** – *Include your ATM procedures if the cage is included in any part of the process.*
- **Imprest Amounts** – *Include your cage imprest amount, unless you have received authorization to run a floating balance in your cage.*
- **Minimum Cash on Hand** – *Include the time you will meet the minimum cash on hand requirements of WAC 230-15-050. This time must be within three hours of opening for the business day.*

COUNT TEAM

Include the following information in the Count Team section of your Internal Controls

- **Count Time** – *Include the time your count is performed.*
 - *If approved for a 2 person count team and currency counter (Include the name of the manufacturer and model).*

SURVEILLANCE

Include the following information in the Surveillance section of your Internal Controls, for all required CCTV coverage

- **Surveillance Room** – *Include a listing of job positions authorized in the surveillance room. If you have more than one surveillance room, provide separate lists.*
- **Digital Recording** – *State if you use motion activated recording. Provide the name or position of your system administrator. Include the level of access by job position for all your surveillance staff and any others with access to the system. Include make, model and the digital surveillance system manufacturer specification sheet.*
- **Camera and Monitor Placement** – *Include a floor plan showing the placement of all cameras and monitors. Include the corresponding digital or analog recording device.*
- **Camera Views** – *Include a chart describing the view of each camera. Note which cameras are used to cover the movement of drop boxes.*
- **Multiplexing or Quad Recording** – *Include the camera views recorded on each multiplexing and quad recording device.*

GAMBLING DEPARTMENT

Include the following information in the Gambling Department section of your Internal Controls

- **Gambling Equipment** – *Include pictures, diagrams or drawings of the following:*
 - *Chips;*
 - *Cards;*
 - *Layouts;*
 - *Shuffling devices – include the name of the manufacturer and model;*
 - *Progressive Jackpot and Bonus Jackpot Systems – include the name of the manufacturer and name of the system;*
 - *Electronic display that read and display gaming outcomes – include the name of the manufacturer and name of the system; and*
 - *Electronic card shoes – include the name of the manufacturer and model.*

- **Underage Gambling**
 - *Include procedures if you conduct in-house underage compliance test programs.*

- **Card Games** – *Include the following for each authorized game you will offer.*
 - *Game rules (rules posted on the agency website do not need to be included);*
 - *Minimum and maximum permissible wagers;*
 - *Jackpot accumulation: explain if a jackpot is a progressive jackpot or a bonus jackpot, as applicable;*
 - *Shuffling, cutting, and dealing techniques, as applicable; If approved for pre-shuffled cards for mini-baccarat;*
 - *Dealer take and pay procedures;*
 - *Chip purchase procedures (including proving of chip and coin inventory);*
 - *Table opening and closing procedures (including proving of chip and coin inventory);*
 - *Payout odds on each form of wager, including any player/dealer payout limits and/or aggregate limits;*
 - *Procedures to be followed on occurrence of irregularities, including explanation of irregularities as applicable to each game; and*

- **Tip Acceptance Procedures** – *Include procedures for the acceptance of gratuities (See Accounting Department section for procedures to account for tips.)*
 - *Actions required of dealers so floor supervisors and surveillance are able to observe tips dealers receive.*

SELF-EXCLUSION

Include the following information in the Self-Exclusion section of your Internal Controls

➤ **Responsibilities**

- *Identify contact person(s) for the Self-Exclusion Program. This person(s) will be responsible for the Self-Exclusion procedures listed in WAC 230-23-030(4).*
- *Describe process for implementing updates to the state-wide self-exclusion list within 48 hours of being notified by WSGC that the self-exclusion list has been modified.*
- *Provide description of information and resources to be given to participants as well as the format (printed or digital) in which it will be given.*

➤ **Training**

- *Detail procedures for training all new employees within three days of hiring and retraining all employees annually as required by WAC 230-23-030(7):*
 - *At a minimum, the training must consist of information concerning the nature of gambling disorders, procedures for requesting self-exclusion (which should be the licensee's procedures for registering patrons) and assisting patrons in obtaining information about problem gambling and gambling disorder treatment programs.*
 - *Describe how required training will be documented.*

➤ **Enrollment**

- *Detail procedures for enrolling persons at the house-banked cardroom as required by WAC's 230-23-010(a), 230-23-025, and 230-23-030. Procedures must include:*
 - *Completing and submitting the provided WSGC form as required.*
 - *Providing person information and resources about problem gambling and gambling disorder treatment programs.*
 - *Closing all player accounts and memberships of the participant and clearing out all accumulated points.*
 - *Denying the participant from all the following: Check cashing privileges, player club membership, complimentary goods and services.*
 - *Removing the participant from targeted mailings, tele-marketing promotions, social media marketing & promotions, players club materials, and other benefits, privileges, and promotional materials relative to HBCRs.*

➤ **Monitoring**

- *Detail procedures for preventing participants from gambling as required by WAC's 230-23-025 and 230-23-030. Procedures must include:*
 - *Removal of participants from the premises unless they are carrying out their employment duties.*
 - *Utilizing player tracking system and other electronic means to assist in determining whether participants have engaged in an authorized gambling activity.*
 - *Verifying jackpot winners (Progressive, House Jackpot, PSJ) are not participants in Self-Exclusion prior to being paid.*
 - *Confiscating money and/or chips purchased, obtained, or owed to the participant due to gambling.*
 - *Notification to the WSGC within 72 hours, completion of incident reports, retention of surveillance evidence, where confiscated funds will be stored, and how confiscated funds will be dispersed as required by WAC 230-23-030(9)(i).*
 - ◆ *Retention: Documentation of the removal of participants and distribution of confiscated funds must be retained for at least 1 year and must include copies of canceled checks.*

➤ **Disclosure of Self-Exclusion Information**

- *Detail procedures for ensuring self-exclusion information is protected from unauthorized disclosure.*
- *Detail procedures to ensure immediate notification to WSGC in the event a participant accesses services from a contracted service provider.*

RECORDS

All records contained in the House-banked Card Room Record Keeping Packet provided to you shall be maintained in the prescribed format and provided in this section. Modifications to the appearance, but not the content, are allowed, but must be approved by the local agent prior to implementation.

Any additional records, forms, or documents not found in the House-banked Card Room Record Keeping Packet but used by the organization must also be included in this section.