



Mille Lacs Band of Ojibwe Indians
Gaming Regulatory Authority
Office of Gaming Regulation and Compliance

September 11, 2025

**NOTICE OF INTENT
TO ADOPT**

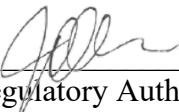
Pursuant to 15 MLBSA § 305(b)(2), this serves as the official Notice of Intent to Adopt the following:

**Changes to:
DETAILED GAMING REGULATION – 6 Class III Technical Standards**

Summary of changes to DGR-6 Class III Technical Standards includes:

1. Numbering to match other DGRs
2. A new DGR, combining standards from other DGRs and codifying and expanding on requirements in the Tribal/State compact

Pursuant to 15 MLBSA § 305(b)(2)(A): Comments may be submitted on the proposed regulation no later than thirty (30) days from the date of the notice. The proposed regulation may be modified if supported by the data and views submitted. Comments may be submitted **no later than 8:00 a.m. on Monday, October 13th, 2025**, to the Executive Director of the Office of Gaming Regulation & Compliance at **Gaming Regulatory Authority, 777 Lady Luck Drive, Hinckley, MN 55037**, or emailed to **mpomerleau@mlbgra.com**.



Gaming Regulatory Authority Board

09/11/25

Date



Mille Lacs Band of Ojibwe Indians

Gaming Regulatory Authority

Detailed Gaming Regulations

DGR- 6 Class III Technical Standards

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1. Video Games of Chance (VGC) Testing and Approval Procedures

- 1.1. All VGCs and VGC software shall be tested and approved by an approved Independent Test Laboratory (ITL) prior to purchase, lease, or as otherwise acquired by the Gaming Operation/Gaming Enterprise. Only ITL approved hardware, software, and attached peripherals may be placed on the gaming floor and offered for play.
- 1.2. All VGCs, VGC software, and VGC systems must meet tribal/state compact requirements and any applicable GRA standards.
- 1.3. No modification to the assembly or operational functions of any VGC or related equipment may be made after testing and installation unless the ITL certifies to the State Department of Public Safety and the GRA that the modified video games of chance conform to the standards of the Compact.
 - 1.3.1. All proposed modification(s) shall be described in a written request made to:
 - a. State Commissioner of Public Safety
 - b. Approved ITL
 - c. GRA
 - 1.3.2. All proposed modification(s) shall contain information describing the following:
 - a. The modification
 - b. The reason for the modification
 - c. All documentation required by the ITL

2. VGC Hardware Specifications

- 2.1. VGCs operated within the Gaming Facility must be licensed by the GRA and shall meet the following specifications:
 - 2.1.1. Electrical and mechanical parts and design principles may not subject a player to any physical hazards.
 - 2.1.2. A surge protector must be installed for all power which is fed to the device.
 - 2.1.3. A battery back-up, or an equivalent, for the electronic meters must be capable of maintaining accurate readings for 180 days after power is discontinued from the device for all information regarding the following:
 - a. Current and total amounts wagered and paid out
 - b. Records of access to the logic board compartment
 - c. Records of access to the cash compartment
 - d. Such other data as may be required by written regulation of the GRA
 - 2.1.4. A power switch must be located in an accessible place within the interior of the game which controls the electrical current used in the operation of the game.
 - 2.1.5. The operation of the VGC, including other component parts, must not be adversely affected by static discharge, radio frequency interference or other electromagnetic interference.

- 2.1.6. At least one electronic bill/voucher/ticket acceptor must be installed in or on each video game of chance, with the exception of cashless devices.
- a. The VGCs may also contain token or bill acceptors, for denominations determined by the GRA or cashless ticket acceptors and cashless ticket dispensers,
 - b. Prior to operation within the Gaming Facility, all models of bill or cashless ticket acceptors and cashless ticket dispensers installed must have been tested and approved in writing by an ITL.
- 2.1.7. The internal space of the VGC shall not be readily accessible when the door is closed and locked/secured.
- 2.1.8. Electronically programmable read only memory (EPROM) chips, USB sticks, flash cards, and any other software device (hereinafter VGC software) and other logic control components shall be located in a separate compartment within the VGC, and that compartment shall be locked with a different key or combination than that used for the main cabinet door.
- 2.1.9. The currency component shall be secured with a different key or combination than used for the main cabinet door and the logic compartment.
- 2.1.10. No hardware switches (DIP Switches) may be installed which alter the pay tables or payout percentages for the game.
- 2.1.11. Each VGC shall have an unremovable identification plate on the exterior of the cabinet which contains the following information:
- a. Manufacturer
 - b. Serial Number
 - c. Model Number
- 2.1.12. The GRA shall place on each VGC a sticker with a license stamp and unique number certifying compliance with applicable standards.
- 2.1.13. The rules of play for each game must be prominently displayed on the game screen or the cabinet face.
- a. The Gaming Operation/Gaming Enterprise shall not permit the display of any rules of play which are:
 - i. Incomplete
 - ii. Confusing
 - iii. Misleading
 - b. Each game must display the credits wagered and the credits awarded for the occurrence of each possible winning combination based on the amount wagered.
 - c. At no time shall stickers or other such materials be placed on the machine face which obscure the rules of play or the operational features of the game.
- 2.1.14. The hardware requirements above shall not be construed to prevent the operation of the VGC as part of a linked or wide-area progressive.

- 2.1.15. A VGC capable of bi-directional communication with external associated equipment must utilize communication protocol which ensures that erroneous data or signals will not adversely affect the operation of the device.
- 2.1.16. No VGCs may be equipped with a device which permits the player to activate the game with the use of a credit or debit card.

3. Cashless VGCs and Ticket Standards

- 3.1. The Gaming Operation/Gaming Enterprise shall develop a system of internal controls for machine access to VGCs, related equipment and VGC software, including but not limited to, the following:
- 3.2. VGCs that accept currency, cashless electronic credits, cashless tickets and issue cashless tickets shall comply with the following:
 - 3.2.1. Available credits may be collected from the video gaming device by the player pressing the “collect” button at any time other than during the following:
 - a. A game being played
 - b. Audit mode
 - c. Any door open
 - d. Test mode
 - e. A credit meter or Win meter incrementation, unless the entire amount is placed on the meters when the collect button is pressed
 - f. An error condition
 - 3.2.2. If credits are collected and the total value is greater than the printer limit for printer games, the games shall lock up until the following is performed:
 - a. The credits have been paid
 - b. The hand pay cleared by an attendant
 - 3.2.3. The VGC shall either keep a duplicate copy or print only one (1) copy of the ticket to the player.
 - 3.2.4. Each VGC shall have two dedicated logs which will record and retain a ticket history consisting of at a minimum thirty-five (35) tickets printed and thirty-five (35) tickets redeemed.
- 3.3. An approved VGC system for currency, cashless electronic credits, cashless tickets and issue cashless tickets transactions shall comply with the following:
 - 3.3.1. The VGC system shall be capable of validating ticket payouts.
 - a. Payment by printer as a method of credit redemption shall only be permissible where the gaming device is linked to a slot management/reporting system, which allows validation of the printed ticket.
 - b. Validation approval or information must come from the host system and tickets may be validated by a cashier, VGC, or validation/redemption terminal.
 - c. If communication is lost, due to the validation system being down or other cause, the VGC shall require a manual hand pay.

- 3.3.2. The VGC system shall maintain the following information for each cashless ticket:
 - a. Machine number and location
 - b. Operator number
 - c. Serial number
 - d. Issue date and time
 - e. Paid date and time
 - f. Dollar amount
- 3.3.3. The VGC system shall retain information pertaining to the ticket at least as long as the ticket is valid for redemption at that location.
- 3.3.4. Reports shall be generated on a daily basis containing the total of cashless tickets issued, redeemed, and unredeemed.
- 3.3.5. In the event that the VGC management/reporting system is temporarily down, a Gaming Operation/Gaming Enterprise Management and the OGR&C shall be immediately notified.
- 3.4. Printers for VGCs that accept currency, cashless electronic credits, and cashless tickets, and issue cashless tickets shall comply with the following:
 - 3.4.1. In order to ensure that changing the paper does not require access to the drop (cash) or logic areas, the ticket printer shall be located in a locked area of the video gaming device but shall not be located in the logic area or in the drop cabinet.
 - 3.4.2. A printer shall have mechanisms to allow software to interpret and act upon the following conditions, which shall trigger an error condition:
 - a. Out of paper/paper low
 - b. Printer jam/failure
 - c. Printer disconnected (this may only be detected when the software tries to print)
- 3.5. Cashless tickets shall comply with the following:
 - 3.5.1. The Gaming Operation/Gaming Enterprise shall develop a system of internal controls for cashless tickets, including but not limited to the following:
 - a. The cashless ticket shall be valid for a period of sixty (60) days, commencing from the time of issuance from the video gaming device.
 - i. Tickets may be redeemed for payment or inserted into another gaming device and wagered.
 - ii. After the sixty (60) day period has expired, an unredeemed cashless ticket shall have no cash value.
 - iii. If payment is made on an expired cashless ticket, an override to the slot management/reporting system shall be processed by an authorized supervisor or management personnel.
 - b. Controls governing the printing of cashless tickets, including:

- i. Printing of a cashless ticket at the VGCs reflecting all remaining credits at the customer request
 - ii. Printing of the cashless ticket at the VGCs by an internal document printer
- c. Controls to mitigate the risk of counterfeiting of cashless tickets
- d. Controls for the redemption of cashless tickets, including:
 - i. Redemption for payment at a cashiering window
 - ii. Redemption for payment at a redemption kiosk or other remote redemption location
 - iii. Inserted into another VGCs for wager
- e. Controls for the manual payout of credits in situations in which the cashless ticket is not available, such as printing error or other system limitation

3.5.2. The cashless ticket shall, at a minimum, contain the following printed information:

- a. Casino location
- b. Machine number and location
- c. Date and time
- d. Alpha and numeric dollar amount of the cash out
- e. Cashless ticket serial number
- f. Validation number
- g. Bar code
- h. Type of transaction
- i. A phrase stating the tickets expiration period
- j. Any additional information required by the GRA.

3.5.3. If the gaming device is capable of printing duplicate tickets, the following shall apply:

- a. Each duplicate ticket printed by the device shall clearly indicate on its face that it is a duplicate
- b. The slot management/reporting system shall be capable of readily and accurately identifying duplicate tickets.

3.6. Automated ticket redemption equipment shall comply with the following:

3.6.1. If the ticket is inserted into automated ticket redemption equipment, the equipment and related software shall scan the bar code via an optical reader or its equivalent.

- a. If the optical reader or its equivalent is unable to read the bar code, the equipment shall reject the ticket back to the presenter for redemption at a change booth or cashier cage.

- b. If accepted, the ticket shall remain secured within the equipment until dropped by authorized personnel.
 - c. The validation number shall be transmitted to the host computer for redemption purposes.
 - i. The host computer shall verify the authenticity of the cashless ticket and communicate directly back to the automated ticket redemption equipment.
 - ii. If valid, the automated ticket redemption equipment pays the customer the appropriate amount and the cashless ticket is electronically noted "paid" in the system.
 - iii. This equipment will retain in critical memory the following event log:
 - (1) Date/time of redemption;
 - (2) Amount of the cashless ticket;
 - (3) At least the last 4 digits of the validation number;
 - (4) Machine number of the cashless ticket
 - (5) The voucher in event log will retain at least 35 events in critical memory.
 - d. The equipment and/or the host computer will maintain an independent printable audit trail of all tickets paid containing the following:
 - i. Transaction number
 - ii. Validation number
 - iii. Paid time and date
 - iv. Amount
- 3.6.2. The automated ticket redemption equipment and related software shall be configured in accordance with the following:
- a. Ticket redemption transactions over the current taxable jackpot amount shall be rejected for processing and require manual payout
 - b. Cage Management personnel shall be notified of transactions over a predetermined amount
- 3.6.3. The automated ticket redemption equipment and related software shall produce balancing reports on demand with the following information for audit purposes:
- a. Dollar amount of tickets redeemed
 - b. Amount of cash issued by denomination
 - c. Available balance
- 3.6.4. The automated ticket redemption equipment shall not have the capability to produce a ticket in a form acceptable for insertion within a VGC for credit.
- 3.6.5. The automated ticket redemption equipment shall house the software of the machine within a secure location (dual access area).

- 3.6.6. The server software responsible for interfacing with an approved slot management/reporting system shall be within a secure location which limits general access.
- a. If for any reason communication is lost between the automated ticket redemption equipment and the VGC management/reporting system, tickets will no longer be accepted for redemption at the automated ticket redemption equipment.
 - b. The automated ticket redemption equipment shall be designed to ensure the integrity of transactions in progress in the event of power surges or a complete power loss.
 - c. The automated ticket redemption equipment shall be equipped with a UPS, Uninterruptible power supply.
 - d. The automated ticket redemption equipment shall be monitored by the related software that will allow the completion of the current transaction, when detecting power loss, before placing the equipment out of service.

4. Software Requirements for VGCs

- 4.1. Each VGC must have a true random number generator which will determine the occurrence of a specific symbol or a specific number to be displayed on the video screen where such symbol, card, or number is wholly or partially determinative of the outcome of a game.
- 4.1.1. A selected process will be considered random if the following requirements are met:
 - 4.1.2. Chi-Square analysis: Each symbol, card, stop position, or number position which is wholly or partially determinative of the outcome of a game, satisfies the 99 percent confidence limit using the standard chi-square analysis.
 - 4.1.3. Runs Test: Each symbol, card, stop position or number does not as a significant statistic produce detectable patterns of game elements or occurrences. Each symbol, card, stop position or number will be regarded as random if it meets the 99 percent confidence level with regard to the "runs test" or any generally accepted pattern testing statistic.
 - 4.1.4. Correlation Analysis: Each pair of symbols, card, stop positions or number positions is independently chosen without regard for any other symbol, card or number drawn within that game play. Each pair of symbol, card or number positions is considered random if it meets the 99 percent confidence level using standard correlation analysis.
 - 4.1.5. Serial Correlation Analysis: Each symbol, card, stop position or number is independently chosen without reference to the same symbol, card, stop position or number in the previous game. Each symbol, card, stop position or number position is considered random if it meets the 99 percent confidence level using standard serial correlation analysis.
 - 4.1.6. Live game correlation: VGCs that are representative of live gambling games must fairly and accurately depict the play of the live game.
- 4.2. Each VGC must meet the following maximum and minimum theoretical percentage pay out during the expected lifetime of the game.
- 4.2.1. VGC payouts shall meet compact requirements for minimum/maximum percentages allowed, for both outcomes affected by player skill and outcomes not affected by player skill.
 - 4.2.2. For the video game of keno and other similar games, the theoretical payout percentage requirements apply to each number of spots marked and shall meet compact requirements for minimum/maximum payout percentages allowed.

- 4.3. Each VGC must have a probability of obtaining the maximum payout which meets compact requirements.
- 4.4. Each VGC must be capable of continuing the current game with all current game features after a game malfunction is cleared automatically or by an attendant.
- 4.5. Each game shall maintain electronic accounting meters.
 - 4.5.1. Electronic accounting meters shall be maintained at all times, whether or not the game is being supplied with external power, unless an online VGCs monitoring system is utilized that captures similar data.
 - a. Mechanical meters are not required.
 - b. If mechanical meters are utilized, they must be fully functional.
 - 4.5.2. The following information must be recorded and stored on meters capable of maintaining totals no less than eight digits in length:
 - a. Total bills inserted value which are inserted by players)
 - b. Number of Credits Wagered
 - c. Number of Credits Won
 - d. Credits paid out by Printed Ticket Voucher or cash paid by the device
 - 4.5.3. The following information must be recorded and stored on meters capable of maintaining totals no less than six digits in length:
 - a. Number of Times the Logic Area was accessed
 - b. Number of Credits Wagered in the current game
 - c. Number or credits wagered in the last complete valid game
 - d. Number of cumulative credits representing credits won and money inserted by a player but not collected, commonly referred to as the credit meter
- 4.6. The following specific promotional meters requirements shall apply to promotional gaming devices:
 - 4.6.1. Total Promotional Awards In (received by game) meter, which includes:
 - a. Total non-restricted Promotional In
 - b. Total restricted Promotional In
 - 4.6.2. Total Promotional Awards Out (removed from game and transferred back to player account) meter, if applicable, which includes:
 - a. Total non-restricted Promotional Out
 - b. Total restricted Promotional Out
 - 4.6.3. Promotional gaming devices must have the ability to recall the last twenty-five (25) promotional transactions received from the system and the last twenty-five (25) promotional transactions transmitted to the host system.

- 4.6.4. If a gaming device has bonusing or host-cashless features, or both enabled simultaneously with promotional features, a single 100-event log shall suffice.
- 4.6.5. The following information must be displayed:
 - a. The type of transaction (upload/ download) including restrictions (cashable or non-cashable, etc.) if utilizing a single 100-event log
 - b. Transaction value
 - c. Time and date
- d. The players account number or a unique identifier, either of which can be used to authenticate the source of the funds 4.7 No VGC shall have a mechanism or program which will cause the electronic accounting meters to automatically clear. The electronic accounting meters may be cleared only after written records of the readings before and after the clearing process are taken by the Gaming Operation/Gaming Enterprise, which shall also record the reason the meter was cleared.
- 4.8 To account for cashless tickets accepted by a gaming device, information recorded by the electronic gaming device meters or the slot management/reporting system shall include:
 - 4.8.1 Total value of all items accepted
 - 4.8.2 Total number of all items accepted
 - 4.8.3 The “drop” meter, which shall maintain a cumulative credit value of all bills or cashless tickets inserted into the bill acceptor for play
 - 4.8.4 A separate meter that accumulates the number and value of cashless tickets accepted, not including bills

5. Server Supported Game System Requirements

- 5.1. The server supported game system may be composed of one or more servers for load balancing, redundancy, or functionality.
- 5.2. If the server supported game system performs tasks required by other systems (i.e. on-line monitoring or ticket validation), the relevant portions of the server supported game system performing those tasks must be evaluated and tested against the standards required for those other systems.
 - 5.2.1. Logic control components shall include all types of program storage media used to maintain the executable program that causes the gaming device to operate. Such devices include, but are not limited to:
 - a. Hard disc drives
 - b. PCMIA cards
 - c. VGC Software
 - d. EPROMs,
 - e. CD-ROMs and similar storage media.
 - 5.2.2. Storage media partitions containing executable programs relating to the operation of the game shall not have the ability to be modified any time the gaming device is executing the program that causes the gaming device to operate.
 - 5.2.3. Sealing tape, or its equivalent, shall be used over areas that are access sensitive.

- 5.2.4. Logic control components along with VGC software and logic boards shall be maintained in a locked, sealed dual access area.
- 5.2.5. Logic control components shall be capable of inspection.
- 5.2.6. Devices shall be able to be compared on a bit for bit basis.
- 5.2.7. Each controlled component of the Server Supported Game System must have a method to be verified via a third-party verification procedure, which may not include any process or security software provided by the operating system or the manufacturer.
- 5.2.8. Devices shall be capable of verification by one or more of the following methods:
 - a. Signatures
 - b. Hash codes
 - c. Another secure algorithm
 - d. The Server Supported Game System shall be capable of verifying that all control programs contained on the server or system are authentic copies of approved components, both automatically every 24 hours and on demand.
 - i. The method of validation must provide at least 128 bits of resolution or must be a bit-for-bit comparison and must prevent the execution of any control program component if the component is determined to be invalid.
 - ii. If an error is detected, the Server Supported Game System must provide a visual notification of the invalid program.
 - iii. A program component of the verification mechanism must reside on and securely load from non-alterable program storage media.
 - iv. A report must be capable of being generated that details the outcome of each automated execution of the validation mechanism which identifies any invalid program components.
- 5.2.9. The Server Supported Game System must be capable of conducting an independent integrity check of all applicable controlled components residing on the Server Supported Game System when used to download software, games and other configuration data and must have the on-demand ability to authenticate all applicable controlled components for copies residing on the system.
 - a. The Server Supported Game System must authenticate all critical files including, but not limited to, executables, data, operating system, and other files which may affect the game outcome or operation and for which a copy resides on the system.
 - b. The Server Supported Game System must employ a third-party industry standard secure hashing algorithm.
 - c. A report must be capable of being generated that details the verification results for each controlled component verification.
 - d. In the event of failed authentication, the Server Supported Game System must deactivate the controlled component so that it is not possible to download, install, or configure the controlled component.

- 5.2.10. The server that supports a server assisted game must be able to provide the following information:
- a. A complete play history for the most recent games played and at least nine (9) games prior to the most recent game for each VGC connected to the Server Supported Game System
 - b. The game outcome, intermediate play steps, credits available, bets placed, credits paid, and credits cashed
 - c. Game recall information for all VGCs that are connected to the Server Supported Game System, including the game recall information associated with a particular VGC which must be accessible from the VGC initiating the game recall
 - d. A complete transaction history for transaction with a cashless wagering system to include the most recent thirty-five (35) transactions for each VGC that incremented any of the cashless in or out meters, including the transaction history associated with a particular VGC which must be accessible from the VGC initiating the transaction history
- 5.3 The Server Supported Game System must contain a download data library for the formal storage of all approved data files, including but not limited to the following:
- 5.3.1 Control and game software
 - 5.3.2 Peripheral firmware
 - 5.3.3 Configuration data
- 5.4 Any change made to the download data library, including the addition, changing or deletion of game programs, must be stored in an unalterable audit log which must include the following:
- 5.4.1 Time and date of access or event
 - 5.4.2 Log in name
 - 5.4.3 Download data file(s) added, changed, or deleted
- 5.5 Any record of activity that involves the downloading of program logic, the adjustment of video game settings/configurations, or the activation of previously downloaded program logic must be stored in an unalterable audit log which must include:
- 5.5.1 The VGC the game program was downloaded and, if applicable, the program replaced;
 - 5.5.2 The VGC the game program was activated on and, if applicable, the program replaced; and
 - 5.5.3 Any changes to the VGC configuration settings or configurations, indicating the values before and after the change.