



Mille Lacs Band of Ojibwe Indians  
*Gaming Regulatory Authority*  
*Detailed Gaming Regulations*

**SENSITIVE KEY CONTROL STANDARDS**

**Document No. DGR – 24**

**Effective: October 1, 2009**

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**I. LIST OF AUTHORIZED PERSONNEL.**

**Section 1.** Each Gaming Enterprise shall submit to the GRA Board a list of authorized persons who have access to sensitive keys.

**Section 2.** Amendments to the list of associates with authorized access must be updated as often as necessary to correctly reflect Associate additions or deletions by the Gaming Enterprise and submitted to the GRA Board on an annual basis, or immediately upon Authority request.

**II. GENERAL KEY CONTROLS.**

**Section 1.** Each Gaming Enterprise shall develop written procedures that at minimum include, but not be limited to:

- A. Segregation of duties shall be maintained between the key custodian and the locksmith.
- B. The key custodian shall be prohibited from accessing sensitive and restricted key blanks and cutting codes.
- C. No one associate or department can have access to more than one key to a dual or triple access area with the exception of the drop/count team during the drop or count.
- D. Associates having control over a key which accesses a sensitive area must maintain control over their key at all times.
- E. Non-gaming keys must be maintained in a separate key lock box. The Gaming Enterprise is prohibited from commingling sensitive (dual or triple access) keys with non-gaming keys. (Non-gaming keys are defined as any key(s) not addressed in this regulation.)
- F. Errors on key control documents must be corrected by drawing a single line through. Associates involved in the transaction must initial with their legible unique identification number verifying the correction.
- G. For all triple access keys required by the drop/count team, documentation must be completed to evidence that three (3) drop/count team members are present when the keys are issued and returned for the count of the gaming revenues. The drop team member(s) who signed or accessed the keys must accompany these keys at all times until the time of their return.
- H. Access to a triple access key at other than scheduled drop and count times requires three Key associates from separate departments with segregated functions, one of which must be a member of management, and must be present at the time the key(s) are issued. All three persons are required to accompany the keys at all times until the time of their return. This access includes, but is not limited to, emergency drops, patron disputes, etc.

**III. SENSITIVE LOCK CONTROL**

**Section 1.** All dual or triple access locks (or interchangeable cores if using interchangeable core locks) shall be received and maintained in a secure manner requiring dual access to obtain.

**Section 2.** Video Games of Chance door locks and Table Games Chip Tray locks shall be received and maintained in a secure manner requiring dual access to obtain and follow all inventory control procedures outlined in this section.

**Section 3.** Perpetual individual records shall be maintained for each type of dual or triple access lock that indicates the following:

- A. Number of locks in beginning inventory;
- B. Date the locks were received;



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- C. Signature of associate(s) that received it into inventory with their legible unique identification number;
- D. Lock name and description/number;
- E. Date of replacement (month, day and year);
- F. Time of issuance;
- G. Signature of associate(s) replacing the lock with their legible unique identification number;
- H. Reason for addition or removal of locks; and
- I. Disposition of broken locks

**Section 4.** An inventory of dual or triple access locks shall be maintained in such quantity that there will always be at least one lock in inventory for each type of lock.

**Section 5.** An inventory of all dual or triple access locks shall be conducted on at least an annual basis and forward the results to the OGR&C.

**Section 6.** All discrepancies will be investigated and documented and forwarded to the OGR&C.

**IV. KEY INVENTORY AND KEY ACCESS LIST.**

**Section 1.** All key box locations that contain sensitive/restricted keys must maintain a current and accurate key inventory and key access list.

- A. Sensitive keys are defined in DGR 24 Part IV and;
- B. Restricted keys are those additional single access keys relative to gaming operations that are restricted by the Slot, Table Games, Finance, Bingo, Pull Tab, Marketing, Information Systems and Card Games departments.(i.e. Video Games of Chance Doors, departmental cashier drawers, kiosk, ATM, chip trays etc.).

**Section 2.** At a minimum, the key inventory list shall include, but is not limited to, the following:

- A. Key tag/ring number, and
- B. Key(s) name, and Key(s) description must match the physical markings on the key(s).

**Section 3.** Access to sensitive/restricted keys is limited to only those associates specified in writing.

- A. Each key box custodian must maintain an accurate key access list that contains the names and job titles of those associates authorized to access keys or signature cards for each associate with signatory authority for authorized keys.
- B. The key access list and/or signature cards must be on file at the key box location.
- C. All access lists shall be updated as often as necessary to reflect Associate additions or deletions.

**Section 4.** The Gaming Enterprises written internal control procedures must indicate which associates have the authority to make changes, deletions, and/or additions to the key inventory and key access lists.

**Section 5.** A documented inventory must be conducted by the key box custodian on a daily basis for sensitive and restricted key lock boxes utilized during the shift to ensure all keys are accounted for.

**Section 6.** All discrepancies will be investigated, with the results of the investigation documented and forwarded to the OGR&C within 24 hours.

**V. SENSITIVE KEYS DEFINED.**

**Section 1.** Triple Access Keys. Keys requiring three individual signatures to obtain:

- A. Table Game and Card Games Drop Box Contents key;



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- B. Video Game of Chance currency acceptor contents key;
- C. Video Game of Chance coin drop cabinet key.

**Section 2. Dual Access Keys.** Keys requiring two individual signatures to obtain:

- A. Table Games Release Key.
- B. Video Games of Chance Currency Acceptor Door Key.
- C. Video Games of Chance Logic Door Key.
- D. Progressive Controller Keys (linking two or more progressive Video Games of Chance together).
- E. Locked Dispensing Machine Key where controlled manual documents are dispensed. (i.e. whiz machine).
- F. Front Door and Control Panel Keys used to manually access the computerized key security system, if applicable.
- G. Weigh Scale Calibration Key.
- H. Key(s) to any secured area where spare or broken drop boxes containing locks are stored.

**Section 3. Areas Requiring Dual Access.** Storage cabinets, boxes or rooms requiring the involvement of individuals from two separate departments to access.

- A. EPROM Storage Cabinets.
- B. Card Storage Area.
- C. Pull Tab Storage Area.
- D. Bingo Storage Area.
- E. Lock Boxes in the Soft Count Room.
- F. EPROM Duplicator Storage Area.
- G. Storage Rack for Video Games of Chance currency acceptors (with the exception of the count team).
- H. Storage Rack for Table or Card Games Drop Boxes.
- I. Storage area for Sensitive Locks:
  - 1. All Video Games of Chance Locks with the exception of reset locks;
  - 2. Table Games Drop Box locks;
  - 3. Table Games Release key locks.
- J. Lock Boxes containing Duplicate Dual Access Keys.
- K. Lock Boxes containing Dual Access Keys.

**Section 4. Areas Requiring Triple Access.** Storage cabinets, boxes or rooms requiring the involvement of individuals from three separate departments to access.

- A. Lock Boxes containing Triple Access Keys.
- B. Lock Boxes containing duplicate Triple Access Keys.

**Section 5.** All sensitive key locks must be uniquely keyed.

**VI. KEY CONTROL LOGS.**

**Section 1.** All key lock boxes that contain sensitive and restricted keys are controlled through restricted access and key control logs, which are completed (ditto marks, etc. are not allowed) every time a key is checked out and in.

**Section 2.** Before a key can be issued, the associate issuing the key must verify that the associate requesting the key has authority to access the key. The key control log shall include, but is not limited to, the following:



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- A. Date of issuance (month, day and year);
  - B. Time of issuance;
  - C. Signature of associate(s) receiving the key(s) with their legible unique identification number. The associate(s) signing the key control log must be the individual(s) ultimately receiving the key;
  - D. Key tag/ring number(s);
  - E. Reason for removal of sensitive key(s) (i.e., perform Video Games of Chance drop, etc.);
  - F. Signature of associate issuing the key(s) with their legible unique identification number,
  - G. Date of return (month, day and year);
  - H. Time of return;
  - I. Signature of associate(s) returning the key(s) with their legible unique identification number. All keys must be returned by the same associate(s) who signed them out; and
  - J. Signature of associate accepting return of the key(s) with their legible unique identification number.

**Section 3.** An associate is prohibited from transferring possession of an issued key(s) to another associate without proper documentation in the key control log. The only exceptions to transference of the keys are:

- A. In case of an emergency the key(s) can be returned by the associate's supervisor. The associate the key is transferred to must be authorized to obtain the key.
- B. During the count, count room keys may be transferred between associates performing the count provided the keys remain in the count room until the end of the count and the individual(s) who initially signed the key(s) out is to return the key(s).

**Section 4.** An associate is prohibited from maintaining possession of sensitive keys during breaks. Key(s) must be signed back in at the key box location, with documentation in the key control log.

**Section 5.** All key control logs must be completed in ink.

**Section 6.** All duplicate keys shall be maintained in a manner that provides the same degree of control as is required for the original keys.

**Section 7.** Records shall be maintained for each key duplicated that indicate the number of keys made and destroyed.

**Section 8.** Perpetual individual records shall be maintained for each type of duplicate key that indicate the following:

- A. Number of keys in beginning inventory;
- B. Date the key(s) was received;
- C. Signature of associate(s) that received it into inventory with their legible unique identification number;
- D. Key name and description/number;
- E. Date of replacement (month, day and year);
- F. Time of issuance;
- G. Key tag/ring number it was placed on;
- H. Signature of associate(s) replacing the key with their legible unique identification number;
- I. Reason for addition or removal of key; and
- J. Disposition of bent or broken keys.

**Section 9.** An inventory of duplicate keys shall be maintained in such quantity that there will always be at least one duplicate key in inventory for each type of sensitive and restricted key.



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**Section 10.** Audit Department personnel will conduct an inventory of all duplicate keys on at least an annual basis and forward the results to the OGR&C.

**Section 11.** All discrepancies will be investigated and documented and forwarded to the OGR&C.

**VII. MINIMUM STANDARDS FOR TABLE GAMES AND CARD GAMES KEY CONTROL.**

**Section 1.** The table/card games release key must be keyed separately from the key to access the table/card games drop box contents.

**Section 2.** The table/card game drop box release keys (key which releases the drop box from the table) shall be maintained by a department independent of the Table/Card Games department.

**Section 3.** Persons authorized to remove the table/card game drop boxes shall be precluded from having simultaneous access to the table/card game drop box contents keys and release keys.

**Section 4.** During the drop process, the associates authorized to remove drop boxes from the tables are the only associates authorized to have access to the drop box release keys. Count team members may have access to the drop box release keys during the count of soft revenue, in order to reset the drop boxes.

**Section 5.** The involvement of at least two persons independent of the Cage department shall be required to access stored empty table/card game drop boxes.

**Section 6.** Unauthorized access to empty table/card game drop boxes shall not occur from the time the boxes leave the storage racks until they are placed on the tables.

**Section 7.** A person independent of the pit department shall be required to accompany the table/card game drop box storage rack keys and observe each time table game drop boxes are removed from or placed in storage racks.

**Section 8.** Persons authorized to obtain table/card game drop box storage rack keys shall be precluded from having simultaneous access to table/card game drop box contents keys with the exception of the Count team.

**Section 9.** The card game release key to drop either the drop box or the card game jackpot award drop box can be the same.

**Section 10.** The key to access the contents of either the drop box or the card game jackpot award drop box must be keyed separately.

**Section 11.** The card game release key for the drop box and card game jackpot award drop box must be keyed differently than the content key.

**VIII. MINIMUM STANDARDS FOR VIDEO GAMES OF CHANCE KEY CONTROL.**

**Section 1.** The Hard Count room key, Soft Count room key, Video Game of Chance coin drop cabinet key, Video Game of Chance door key, currency acceptor contents key, progressive controller key, logic door key and currency acceptor door key must be keyed separately. The Video Game of Chance belly glass door key may be keyed the same as the Video Game of Chance door key.

**Section 2.** If a licensee utilizes currency acceptor extractor units, the controls surrounding the key(s) to the extractor units must be the same as the controls surrounding the currency acceptor content key(s).

**Section 3.** The currency acceptor canister release keys shall be maintained by a department independent of the Gaming Machine department.



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**Section 4.** Only the person(s) authorized to remove currency acceptor canisters from the gaming machines shall be allowed access to the release keys.

**Section 5.** Persons authorized to remove the currency acceptor canisters shall be precluded from having simultaneous access to the bill acceptor canister contents keys and release keys.

**Section 6.** A person independent of the Gaming Machine department shall be required to accompany the currency acceptor canister storage rack keys and observe each time canisters are removed from or placed in storage racks.

**Section 7.** Persons authorized to obtain currency acceptor canister storage rack keys shall be precluded from having simultaneous access to bill acceptor canister contents keys with the exception of the Count Team.

**Section 8.** The physical custody of the keys needed for accessing stored, full currency acceptor canister shall require involvement of persons from two separate departments, with the exception of the Count Team.

**Section 9.** Only the Count Team members shall be allowed access to currency acceptor canister contents keys during the count process.

**IX. MINIMUM STANDARDS FOR MAIN CAGE/VAULT KEY CONTROL.**

**Section 1.** The following keys may be kept in a single lock key box in the Main Cage:

A. Kiosk and ATM Keys:

1. Currency acceptor stacker release key;
2. Currency dispenser cassette release key;
3. Currency Acceptor stacker content key;
4. Currency dispenser cassette content key;
5. Access to the currency acceptor stacker release key, currency dispenser cassette release key, currency acceptor stacker content key and the currency dispenser cassette content key is restricted to Cage associates with a Security escort when the keys leave the Main Cage.

B. Vault keys;

C. Cashier keys;

D. Personal Product Vending Machine keys.

**X. BROKEN, LOST OR MISSING KEYS.**

**Section 1.** Sensitive and restricted keys are not allowed off the premises. If a sensitive or restricted key is inadvertently taken off premises, the OGR&C must be notified within 24 hours and a security report shall be done and forwarded to the OGR&C. The key control log must also indicate the key(s) taken off premises.

**Section 2.** In the event a sensitive or restricted key or lock is lost, misplaced or missing for any length of time the Gaming Regulatory Authority reserves the right to mandate replacement of said locks or keys.

**Section 3.** Broken keys, unidentified/obsolete keys, or keys for locks that have been changed, must be destroyed and discarded.

- A. The Gaming Enterprise's written internal control procedures must include key destruction procedures for broken keys, unidentified/obsolete keys, or keys for locks that have been changed.





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- B. In the event a sensitive or restricted key is broken, the written internal control procedures must include which associate(s) shall receive and replace the broken key, disposition of the broken key and notification to the OGR&C, if applicable.

**XI. COMPUTERIZED SENSITIVE KEY SECURITY SYSTEM.** If the Gaming Enterprise uses a computerized key security systems which restricts access to the gaming machine drop and count keys through the use of passwords, keys or other means, other than a key custodian, must provide the same degree of control as indicated in the aforementioned key control standards. Note: This standard does not apply to the system administrator.

**Section 1.** For computerized key security systems, the following additional gaming machine key control procedures apply:

- A. Management personnel independent of the Gaming Machine department assign and control user access to keys in the computerized key security system (i.e., system administrator) to ensure that gaming machine drop and count keys are restricted to authorized associates.
- B. In the event of an emergency or the key box is inoperable, access to the emergency manual key(s) (a.k.a. override key), used to access the box containing the gaming machine drop and count keys requires the physical involvement of at least three persons from separate departments, including management. The date, time, and reason for access, must be documented with the signatures of all participating associates signing out/in the emergency manual key(s).
- C. The custody of the keys issued pursuant to DGR 24 Part X Section 1(A) requires the presence of two persons from separate departments from the time of their issuance until the time of their return.
- D. Routine physical maintenance that requires accessing the emergency manual key(s) (override key) and does not involve the accessing of the gaming machine drop and count keys only requires the presence of two persons from separate departments. The date, time and reason for access must be documented with the signatures of all participating associates signing out/in the emergency manual key(s).

**Section 2.** For computerized key security systems controlling access to gaming machine drop and count keys, accounting/audit personnel, independent of the system administrator, will perform the following procedures:

- A. Daily, review the report generated by the computerized key security system indicating the transactions performed by the individual(s) that adds, deletes, and changes user's access within the system ( i.e. , system administrator). Determine whether the transactions completed by the system administrator provide an adequate control over the access to the gaming machine drop and count keys. Also, determine whether any gaming machine drop and count key(s) removed or returned to the key cabinet by the system administrator was properly authorized.
- B. For at least one day each month, review the report generated by the computerized key security system indicating all transactions performed to determine whether any unusual gaming machine drop and count key removals or key returns occurred.
- C. At least quarterly, review a sample of users that are assigned access to the gaming machine drop and count keys to determine that their access to the assigned keys is adequate relative to their job position.



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D. All noted improper transactions or unusual occurrences are investigated with the results documented.

**Section 3.** Quarterly, an inventory of all count room, drop box release, storage rack and contents keys is performed, and reconciled to records of keys made, issued, and destroyed. Investigations are performed for all keys unaccounted for, with the investigation being documented.

**Section 4.** For Computerized key security systems which restrict access to the table game drop and count keys through the use of passwords, keys or other means, other than a key custodian, must provide the same degree of control as indicated in the aforementioned key control standards.

Note: This standard does not apply to the system administrator.

**Section 5.** For computerized key security systems, the following additional table game key control procedures apply:

- A. Management personnel independent of the table game department assign and control user access to keys in the computerized key security system (i.e. system administrator) to ensure that table game drop and count keys are restricted to authorized associates.
- B. In the event of an emergency or the key box is inoperable, access to the emergency manual key(s) (a.k.a. override key), used to access the box containing the table game drop and count keys, requires the physical involvement of at least three persons from separate departments, including management. The date, time, and reason for access, must be documented with the signatures of all participating associates signing out/in the emergency manual key(s).
- C. The custody of the keys issued pursuant to DGR 24 Part X Section 5(A) requires the presence of two persons from separate departments from the time of their issuance until the time of their return.
- D. Routine physical maintenance that requires accessing the emergency manual key(s) override key) and does not involve the accessing of the table games drop and count keys, only requires the presence of two persons from separate departments. The date, time and reason for access must be documented with the signatures of all participating associates signing out/in the emergency manual key(s).

**Section 6.** For computerized key security systems controlling access to table games drop and count keys, accounting/audit personnel, independent of the system administrator, will perform the following procedures:

- A. Daily, review the report generated by the computerized key security system indicating the transactions performed by the individual(s) that adds, deletes, and changes user's access within the system (i.e. system administrator). Determine whether the transactions completed by the system administrator provide an adequate control over the access to the table games drop and count keys. Also, determine whether any table games drop and count key(s) removed or returned to the key cabinet by the system administrator was properly authorized.
- B. For at least one day each month, review the report generated by the computerized key security system indicating all transactions performed to determine whether any unusual table games drop and count key removals or key returns occurred.
- C. At least quarterly, review a sample of users that are assigned access to the table games drop and count keys to determine that their access to the assigned keys is adequate relative to their job position.
- D. All noted improper transactions or unusual occurrences are investigated with the results documented and sent to the OGR&C.





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**History.** Approved by the Gaming Regulatory Authority on August 6, 2009.

Approved by the Gaming Regulatory Authority Board on August 6, 2009. Effective Date October 1, 2009.

Changes to II. Changes to formatting where applicable, Section I Deleted: "Subject to GRA Board approval, each Gaming Enterprise shall submit for GRA Board approval procedures that include, but not be limited to:", Section 1 (C): Added "or department" and "with the exception of the drop/count team during the drop or count"., Section 1 (F): Added "corrected by drawing a single line", Deleted "lined", Section 1 (H): Deleted "1. Table games and card games drop box content keys; 2. Currency acceptor content keys; and 3. Video Games of Chance coin drop cabinet keys.", Section 1 (I) Deleted: "If the Gaming Enterprise determines an emergency drop of the table game, card game, currency acceptor box or Video Game of Chance coin drop cabinet is necessary, written notification to the OGR&C is required within 24 hours. All such access shall be documented on the key control log. At a minimum, such documentation must include: 1. Date (month, day and year),, 2. Time; 3. Reason for access; 4. Table Game, Card Game or Video Game of Chance number; and 5. Printed name and signature of the participating associates with their legible unique identification number."; Added New III, III. SENSITIVE LOCK CONTROL a. All dual or triple access locks (or interchangeable cores if using interchangeable core locks) shall be received and maintained in a secure manner requiring dual access to obtain., b. Video Games of Chance door locks and Table Games Chip Tray locks shall be received and maintained in a secure manner requiring dual access to obtain and follow all inventory control procedures outlined in this section., c. Perpetual individual records shall be maintained for each type of dual or triple access lock that indicates the following: i. Number of locks in beginning inventory; ii. Date the locks were received; iii. Signature of associate(s) that received it into inventory with their legible unique identification number; iv. Lock name and description/number; v. Date of replacement (month, day and year); vi. Time of issuance; vii. Signature of associate(s) replacing the lock with their legible unique identification number; viii. Reason for addition or removal of locks; and ix. Disposition of broken locks, d. An inventory of dual or triple access locks shall be maintained in such quantity that there will always be at least one lock in inventory for each type of lock. e. An inventory of all dual or triple access locks shall be conducted on at least an annual basis and forward the results to the OGR&C. f. All discrepancies will be investigated and documented and forwarded to the OGR&C.; III Changed to IV, Changes to formatting where applicable; IV Changed to V, Changes to formatting where applicable, Section 3 Added: "the involvement of individuals from", Deleted: "with two locks", Section 4 Added: "the involvement of individuals from" Deleted: "with three locks"; V Changed to VI Changes to formatting where applicable, Section 2(E) Added: "sensitive", Section 8 Deleted: "and triplicate access", Section 9 Deleted: "triplicate"; VI Changed to VII, Changes to formatting where applicable; VII Changed to VIII, Changes to formatting where applicable; VIII Changed to IX, Changes to formatting where applicable; IX Changed to X, Changes to formatting where applicable; X Changed to XI, Changes to formatting where applicable; XI Changed to XII, Changes to formatting where applicable, Added: "Sensitive" **approved by the Gaming Regulatory Authority Board on August 19, 2010. Effective Date August 19, 2010.**