

Colorado Limited Gaming Control Commission
Internal Control Minimum Procedures (ICMP)

SECTION 8

TICKET IN/TICKET OUT AND SLOT COUPONS

A. GENERAL

Refer to Rule 12 in the Colorado Limited Gaming Regulations for regulations related to ticketing and slot coupons.

Ticket In/Ticket Out (TITO) refers to slot machines equipped with a ticket printer and interfaced with a slot monitoring system, which has a centralized ticket validation module. Slot machines so equipped and interfaced will hereafter be referred to as TITO devices. TITO devices are able to dispense an encoded paper ticket to a patron, which can then be inserted into a TITO device, inserted into a self-service ticket redemption kiosk (kiosk), validated and redeemed via a wireless handheld validation unit or redeemed at the cashier's cage. Slot coupons (hereafter, coupons) are coupons printed by the slot monitoring system that can be inserted into a TITO device, inserted into a kiosk, validated and redeemed via a wireless handheld validation unit or redeemed at the cashier's cage. The licensee may choose to limit the method of redeeming coupons (e.g., coupons can be redeemed only at slot machines). The coupon must contain a description of any restrictions on the redemption of the coupon. The licensee may not require the patron to make a wager in order to redeem the coupon.

Licensees that want to offer TITO gaming must submit, electronically, notification of intent to test by completing the Notification of Intent to Test Form 30 days prior to implementation. If a system upgrade is necessary, the licensee must also submit, electronically, a System Install/Upgrade Notification Form a minimum of 14 days prior to the upgrade.

Tickets and coupons may only be accepted at the casino from which they were issued. Tickets and coupons shall only be redeemed at the cashier cage, via a wireless handheld validation unit, kiosk or TITO device to ensure the system verifies the transaction at the time of the redemption. For example, a ticket or coupon must not be accepted at a table game.

A redeemed ticket or coupon is defined as a ticket or coupon validated by the system and paid manually by the cashier, validated via a wireless handheld validation unit and paid by a licensed casino employee, validated by the system and paid by a kiosk, or validated at a TITO device and credits issued onto the device.

Coupons may not be used in the casino until after permanent approval by the Division has been granted of the TITO module. Additionally, any licensed employee granted access to produce slot coupons, cannot be granted access to redeem them.

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Licensees that want to offer coupons must ensure that it has a testing laboratory certification letter indicating the slot coupon feature of the slot monitoring system has been tested and approved for use in Colorado. Fourteen days prior to installing or utilizing coupons, the licensee must electronically submit a system install/upgrade notification form. Some slot monitoring systems already have the slot coupon functionality installed. If this is the case, it must be stated in the memo section of the notification form. In all cases the certification letter, indicating testing and approval of the slot coupon feature, must be included with the notification submission.

System Application Controls

Licensees must have adequate application controls in place to ensure the accuracy of data input, integrity of system processing, and validity of system output. These controls must include both the operational and accounting/reporting aspects of TITO and coupons and must consider the controls described herein.

Tickets and coupons must be controlled in a manner that precludes any one individual from initiating, producing, duplicating and/or redeeming a fraudulent ticket or coupon, obtaining the funds, and misappropriating the funds. Additionally, licensees must have adequate, written backup and recovery procedures in place. These procedures must address contingency plans in the event of data loss or system failure and be applicable to systems used for any purpose related to gaming activity. The procedures must be distributed to all necessary individuals and departments and must be tested periodically to ensure effectiveness.

All slot monitoring systems that report or affect the AGP of a slot machine (for ticketing or coupon purposes) must have a real time or tape data back up device. The back up device must back up all transactions recorded by the system so that if the system experiences catastrophic failure, all of the data in the system can be recovered. The licensee must notify the Division if a system that reports or affects AGP is down for a total of 12 hours in any 30-day period. For example, if the system is down for one hour 12 times within a 30-day period, the casino must notify the Division. Notification is submitted via email to the Division at the appropriate email address: CCBHCasinos@spike.dor.state.co.us or CrippleCreekCasinos@spike.dor.state.co.us.

Meter Information

TITO devices must have a “Voucher Out” meter that accumulates the total value of all tickets issued by the device.

TITO devices must have a “Voucher In” meter that accumulates the total value of all tickets and coupons redeemed by the device.

System Access Controls

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See Slot Monitoring systems Section of the ICMP.

On-Line Tickets and Delayed Tickets

A TITO device can generate two types of tickets: on-line tickets and delayed tickets.

Under normal operation, the system is properly communicating with the TITO device. When a patron cashes out, the TITO device produces an on-line ticket. The patron through the normal redemption process can redeem this ticket.

If a TITO device loses communication with the system before validation information is successfully communicated to the system for the last ticket out transaction, the TITO device may generate a delayed ticket, which contains all information necessary for redemption. Refer to CLGR 47.1-1272(3) for more information on delayed tickets.

Tickets or Coupons as Tips

Licensees that allow their employees to accept tickets or coupons as tips must adhere to the following:

1. Ensure that the ticket or coupon was accepted as a tip, and not removed from an unoccupied machine, found on the gaming floor, or disbursed from a slot machine as a result of machine testing.
2. Tip tickets or coupons may only be redeemed at the cashier's cage.
3. The cashier's cage must segregate tip tickets and coupons from non-tip tickets and coupons, and indicate as such on the Daily Cash Summary.

Tickets or Coupons Redeemed for Patrons

Licensed employees may redeem tickets or coupons for patrons. The ticket or coupon must only be redeemed at a cage or via a wireless handheld validation unit. The ticket or coupon may not be redeemed at a kiosk or slot machine. If the licensed employee takes the ticket or coupon to the cage for redemption, the patron must initial and date the back of the ticket or coupon. See Wireless Handheld Validation Unit Section of the ICMP for procedures regarding the redemption of patrons' tickets using a wireless handheld validation unit.

Overrides

Overrides are defined as changes to system information made at the time of the event. Licensees must have procedures in place to prohibit any changes to system information for tickets or coupons.

The status of a ticket or coupon that has been redeemed, expired or voided must not be changed. If an active ticket or coupon cannot be properly processed under normal

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circumstances, a supervisor must provide system and/or written authorization for the completion of the transaction.

Expiration

Tickets expire 120 days after issuance. Expired tickets are not valid for gaming tax purposes. If the licensee chooses to honor an expired ticket, the payment shall be considered promotional and is not deductible for gaming tax purposes. Evidence of payment for an expired ticket must be visible on the upper right hand corner of the expired ticket. An example of this is writing “Paid Expired” or “PD Exp”, etc.

Coupons must have an expiration date. Coupon payments are considered promotional and not deductible for gaming tax purposes.

Retention

All tickets must be retained until the Division has issued approval to rely upon the ticketing module. After receiving approval, tickets and redeemed coupons in the possession of the licensee must be retained for at least 60 days from date of redemption, expiration or void. **Coupons may not be used in the casino until permanent approval by the Division has been granted.** Tickets and coupons must be destroyed in a manner that precludes them from being used inappropriately. Non-licensed gaming employees may perform the ticket destruction.

TITO Reports

There are two TITO statistical comparison reports that must be prepared. The Ticket Out Comparison Report and the Ticket In Comparison Report.

There are nine TITO reports that are used to support the accuracy of the above TITO statistical comparison reports. Any of these reports that are affected by coupons must have a separate column that segregates the coupon redemptions from the ticket redemptions.

For the description of each of these reports refer to the Accounting section.

B. FLOOR OPERATIONS

Prior to offering TITO devices for patron play, a TITO device checklist must be completed for each TITO device. The checklists must be maintained by the licensee and made available to the Division upon request.

Ticket paper stock used for TITO devices shall be stored in a secure location to prevent unauthorized access, tampering, or theft.

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The licensee must have procedures in place to ensure that tickets are loaded correctly to avoid a blank ticket being issued. In the event of a blank ticket, alternative procedures must be in place to ensure accurate accountability for the ticket.

The licensee must ensure that TITO devices do not issue any other type of ticket (e.g., jackpot ticket). In the event that the TITO device produces any other type of ticket, the licensee must immediately investigate the machine, disable this functionality, and contact the Division.

The slot department must ensure that new devices added to the floor that are not ticket enabled do not accept tickets.

Rejected Tickets

Tickets or coupons rejected by a TITO device should be investigated by using the following criteria:

- Review the ticket event log/history log of the issuing device (this does not apply to coupons),
- Review the status of the ticket or coupon at the cashier cage, and
- Research ticket or coupon event information provided by the system (performed by someone with supervisory authority).

Voided Tickets

If the device prints a voided ticket in the course of normal gaming activity, the ticket must be forwarded to accounting. The slot attendant must sign the back of the ticket prior to dropping the ticket in the locked accounting box.

Non-Value/Non Valid Tickets

Following printer tests, power loss/surges, loss of communication, etc., the printing devices may print tickets that are not valid. These tickets may contain the notation “void”, “void demo”, “demo”, or some other wording to indicate the ticket is not a valid ticket. These tickets have no value even if there is a dollar amount printed on the ticket. The licensee must have procedures in place to ensure these tickets are adequately disposed of to ensure they are not included in the calculation of AGP. If a valid ticket is issued after one of these events, the ticket is processed as normal.

Ticket Jams

In the event of a ticket jam, where the ticket fully printed and did not eject from the printer, the ticket may be removed and handed to the patron.

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In the event of a ticket jam, where the ticket is partially printed, the ticket must be taken to the cashier cage for redemption. If the ticket cannot be redeemed at the cage, further procedures must be performed to ensure the ticket is valid.

Ticket jams are considered a defined event; therefore, the slot machine access log must be completed when accessing the machine.

Duplicate Tickets

In the event of a duplicate ticket being printed, the slot attendant must write “DUPLICATE” on the ticket and take the ticket to the cashier cage to be forward to accounting. Only the one copy of the ticket should be redeemed and paid. The “Duplicate” ticket should not be redeemed and is not deductible for gaming tax purposes.

Duplicate Validation Numbers

In the event a ticket is produced with a validation number that was previously issued it should not be able to be redeemed in the system. The ticket validation number should be researched (e.g., review of the game ticket history, a system report that provides confirmation of the validation number, sequence number and amount, etc.) prior to payment of the ticket to ensure the ticket is valid. If the ticket is found to be valid but cannot be redeemed in the system the ticket may be paid to the patron and the amount of the ticket deducted in the calculation of gaming revenue. All documentation including the research performed that supports the deduction must be maintained as support for the payment and provided to the Division upon request.

Contingency Plan

A contingency plan must be in place in the event of a system failure resulting in loss of communication between the TITO device and the system. If the TITO device does not generate a ticket due to loss of communication for the last ticket out transaction, the last ticket out transaction and all subsequent cash out attempts must result in a hopper pay or a hand pay to the patron until communication is restored. The slot department must pay the patron per jackpot payout/fill procedures as outlined in the Slots section of the ICMP. In the event a ticket is printed after communication has been restored, the licensee must ensure that this ticket is not a duplicate ticket.

C. CASHIER CAGE

Validation and Redemption Procedures

Casinos offering TITO devices must have at least one validation unit that must be located in a cashier’s cage.

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A TITO cage validation checklist must be completed for each cage validation unit. The checklists must be maintained by the licensee and made available to the Division upon request.

If two or more cashiers share a validation unit, the validation unit must be configured to specify each cashier's identification by requiring all cashiers who redeem and pay tickets or coupons to sign onto the unit before processing any tickets or coupons, so that each ticket or coupon is associated with a specific cashier.

If each cashier is assigned to a separate validation unit, the cashier may log onto the validation unit for a discrete session or work shift, and validate tickets or coupons for the duration of the session. Under these circumstances, no other individual may use the validation unit without first terminating the existing cashier's session, and logging in separately. Multiple cashiers may have access to the same validation unit as long as each cashier redeems his/her tickets or coupons under his/her login for his/her session. AT NO TIME may a cashier or supervisor use any other cashier's session or login.

When a supervisor is performing cashier duties and he/she processes a ticket or coupon transaction that requires an additional level of access, the supervisor who initiated the transaction cannot be the same person who completes the transaction. For example, if a ticket or coupon is in a pending status and requires a supervisor to enter his/her user name and password to redeem the ticket or coupon, the supervisor who initiated the transaction may not complete the transaction. If the system does not provide this differentiation, the licensee must have written procedures in place to provide for this segregation of duties.

Prior to paying a ticket or coupon, the cashier must verify the validity of the ticket or coupon through and in the system.

To redeem a ticket or coupon, the validation number is entered into, or the bar code scanned into, the validation unit. If the ticket or coupon is valid for redemption, the cashier pays the patron the appropriate amount and retains the redeemed ticket or coupon for cage accountability. In the event the ticket or coupon is not redeemable, the cashier must notify the gaming manager.

In the event of system failure, the licensee must have written procedures in place to verify the validity of any tickets or coupons and the subsequent payment of such tickets and coupons.

Tickets or coupons paid during a period of system failure without system validation must have its status in the system changed from active to redeemed/inactive when the system resumes operation; however, no later than the end of that cashier's shift. These tickets or coupons must be segregated from the redeemed tickets and coupons until such time as the tickets or coupons have been redeemed through the system. If the system does not resume functionality by the end of the cashier's shift, the cashier must segregate the tickets and coupons and enter the amount on the Daily Cash Summary as "paid

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unredeemed tickets or coupons” and forward the tickets and coupons with the paperwork to accounting. For systems that do not provide for a means to change the status of a ticket from active to redeemed, the licensee must have procedures in place to establish the validity of the ticket before payment is made. The licensee must maintain documentation to support the validity of these tickets. **If during this process it is determined that a duplicate ticket or invalid ticket was paid, the amount paid must be considered promotional funds and cannot be deducted from AGP.**

Cashiers that are presented with a ticket or coupon that an employee has received as a tip must review it to ensure that it has been issued from their casino. Upon verification of the ticket or coupon, it is redeemed through the system. Tickets or coupons received as tips must be segregated and indicated as such on the daily cash summary.

Payment of lost, stolen, or mutilated tickets or coupons that cannot be validated by the system requires the involvement of supervisory personnel to investigate the validity of the ticket or coupon.

If a taxable jackpot is won as a result of a wager on a TITO device, a jackpot slip is completed in accordance with normal jackpot procedures.

Found Tickets or Coupons

Found tickets or coupons are receipted into the cage and documented on a miscellaneous receipt form. Alternatively, a ticket tracking/coupon tracking log may be used to list all found tickets or coupons. Whichever document is used must include the date and time the ticket was found, the location, the amount of the ticket or coupon, as well as the signatures required on a miscellaneous receipt form. Found tickets or coupons are forwarded to accounting and documented on the daily cash summary as a miscellaneous receipt and miscellaneous disbursement to accurately account for all found tickets or coupons. The status of the ticket or coupon must remain unredeemed until claimed by the patron or until the ticket or coupon has expired. Found tickets cannot be used for testing devices.

Void Tickets or Coupons

To void tickets or coupons, the cashier clearly marks “VOID” on the ticket or coupon. The cashier and slot attendant sign and date the ticket or coupon and the cashier submits them to accounting for retention and accountability. Voided tickets or coupons must be segregated from other tickets and coupons and must be submitted to accounting with the cage paperwork. At no time will cashiers or slot attendants void or expire a ticket or coupon in the system. Accounting is the only department with the authority to perform this function.

Duplicate Tickets

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The cashier shall not redeem duplicate tickets. A patron will not be able to redeem his/her valid ticket if a duplicate of that ticket was previously redeemed. The validity of the ticket must be researched prior to payment to the patron. If the ticket is found to be valid it is deductible for gaming tax purposes; however, if the ticket is paid and later found to be invalid the payment is considered promotional. The cashier submits the duplicate ticket to accounting for retention and accountability.

Test Tickets

Money is disbursed from the cage on a miscellaneous disbursement form when the slot department performs machine testing for variance investigations, new machine testing and possible machine malfunctions. It is appropriate for test tickets, from the testing of the TITO device, to be redeemed at the cage. When test tickets are receipted back into the cage, a "miscellaneous receipt" form must be completed. This will allow the cage to balance as no money is leaving the cage at the time test tickets are redeemed. Tickets redeemed as a result of testing are segregated and forwarded to accounting with the cage paperwork. Found tickets cannot be used for testing devices.

Tickets or Coupons as Tips

In the event a cage cashier accepts tickets or coupons as tips during his/her shift, a supervisor must be present at the time the cashier redeems them and must also sign and date them. The cashier's cage must segregate tip tickets and coupons from non-tip tickets and coupons and indicate as such on the daily cash summary.

Status of Manually Redeemed Tickets or Coupons

Licensees must have adequate controls/procedures for changing the status of tickets or coupons that have been manually paid at the cage, but are still reflected as active/unredeemed in the system. The status of such tickets or coupons must be changed from active/unredeemed to inactive/redeemed. These must be controlled and processed in a manner that precludes any individual(s) from fraudulently initiating and/or completing a redemption request, fraudulently obtaining the funds, and misappropriating the funds. At no time shall the licensee change the status of the tickets or coupon from expired, void, inactive/redeemed to active/unredeemed. Any expired, voided, or inactive tickets the licensee chooses to manually pay may be paid from promotional funds. However, they are not deductible for gaming tax purposes.

Reporting

At the end of each cashier's shift, a report must be printed that details the tickets and coupons redeemed by that cashier during his/her shift. The cashier will use this report to reconcile to the cash drawer. The cashier forwards this report to accounting with the cage paperwork including all tickets and coupons for that shift.

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D. COUNT PROCEDURES

See Table Games and Slot Drop and Count Procedures ICMP section 5 for the count procedures.

E. ACCOUNTING PROCEDURES

The licensee must review the Accounting section in the ICMP for additional ticketing and coupon information.

Meters

TITO devices must have a “Voucher Out” meter that accumulates the total value of all tickets issued by the device.

TITO devices must have a “Voucher In” meter that accumulates the total value of all tickets and slot coupons redeemed by the device.

It is accounting’s responsibility to ensure that appropriate and adequate meter readings are available to generate statistical reports.

TITO Reports

There are two standardized TITO statistical comparison reports and several supporting reports which accounting must prepare, review and analyze. Refer to the Accounting section for an explanation and example of the reports that meet the required report standards. The examples provide the required format as well as detailed explanations for the information required to be displayed in each column.

Void Tickets and Coupons

Tickets or coupons to be voided from the cashier cage are forwarded to accounting for retention and accountability. Accounting must verify these and ensure they are properly signed and dated. Only after accounting has determined that the ticket or coupon should be voided can accounting proceed to void them from the system.

If the machine prints a voided ticket in the normal course of gaming activity, the ticket must be forwarded to accounting by being dropped in the locked accounting box. Accounting must verify the reason for the voided ticket and ensure the ticket is voided from the system.

Accounting must ensure that voided tickets are not deducted for gaming tax purposes.

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Non-Value/Non Valid Tickets

Following printer tests, power loss/surges, loss of communication, etc., the printing devices may print tickets that are not valid. These tickets may state on them “void”, “void demo”, “demo”, or some other wording to indicate the ticket is not a valid ticket and the ticket has no value even if there is a dollar amount printed on the ticket. The licensee must have procedures in place to ensure these tickets are adequately disposed of to ensure these tickets are not included in the calculation of AGP. If a valid ticket is issued after one of these events, then the ticket is processed as normal.

Found Tickets

Found tickets are not deductible for gaming tax purposes until claimed by a patron and redeemed. Accounting must ensure that found tickets are not deducted for gaming tax purposes until these criteria are met. Found tickets remain a liability for the casino until they expire after 120 days from issuance or claimed by the patron. Found tickets or coupons cannot be used to perform machine testing.

Ticket or Coupon Overrides

Overrides are defined as changes to system information made at the time of the event. Licensees must have procedures in place to prohibit any changes to system information for tickets or coupons. The status of a ticket or coupon that has been redeemed, expired or voided must not be changed. If a ticket or coupon cannot be properly processed, a supervisor must provide authorization to allow for the completion of the transaction. Accounting must review all override reports to ensure no unauthorized overrides for tickets or coupons have occurred.

Adjustments

Adjustments are defined as changes to system information made subsequent to the time of the event. Any corrections and/or adjustments made to ticket or coupon information must be supported by adequate documentation. In the case where reports are reprinted to reflect any corrections and/or adjustments made by accounting personnel (e.g., “final run” reports), corrected and/or adjusted information reflected on these “final run” reports must be reviewed by someone other than the individual who made the correction/adjustment. The reviewer’s initials and date of the review must evidence this review.

Test Tickets

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Test tickets are issued when the slot department performs machine testing for variance investigations, new machine testing and possible machine malfunctions. It is appropriate for test tickets to be redeemed. Test tickets may be included in “Tickets Redeemed” reported on the gaming tax return. Accounting must ensure accurate reporting for test tickets. Found tickets or coupons cannot be used to perform machine testing.

Expired Tickets and Coupons

Unredeemed tickets expire 120 days after issuance. Expired tickets are no longer valid for gaming tax purposes. If the licensee chooses to honor an expired ticket, the payment shall be considered promotional and is not deductible for gaming tax purposes. Evidence of payment of an expired ticket must be visible on the upper right hand corner of the expired ticket. An example of this is writing “Paid Expired” or “PD Exp”, etc.

Coupons must have an expiration date. Coupon payments are not deductible for gaming tax purposes.

Removal of TITO Devices

Licensees are responsible for ensuring that all unredeemed tickets from a TITO device that have been removed/disabled are accurately tracked for patron redemption, proper reporting and liability purposes until expiration.

Written Accounting Plan

Audit procedures of system-generated data performed by the licensee’s Accounting Department must be documented (typically in the required accounting plan). At a minimum, these audit procedures must address:

1. System statistical report reconciliation procedures.
2. Procedures for ensuring the accuracy of downloaded information and for ensuring an adequate audit trail for any changes to the downloaded information.
3. Procedures for reconciling system reports to source documents (e.g., slot and table drop/count paperwork, cage paperwork, TITO reports, etc.).
4. Policies and procedures for reconstructing drop data in the event of a system failure or other event resulting in data loss (includes currency counter interfaces).
5. Procedures for testing TITO devices brought online during or after initial TITO testing.

Record Retention

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All documents discussed in this section must be retained in accordance with the Division's rules and regulations.

All tickets must be retained until the Division has issued written approval to rely upon the ticketing module. After receiving written approval, tickets in the possession of the licensee must be retained for at least 60 days from date of redemption, expiration or void. Coupons cannot be used in the casino until permanent approval of the TITO module, by the Division, has been granted. Tickets and coupons must be destroyed in a manner that precludes them from being used inappropriately. Tickets and coupons containing signatures or other evidence of internal control procedures must have all of the information contained on the ticket or coupon documented on a separate report or log in order to destroy the ticket after the 60-day retention period.

F. ISSUANCE OF SLOT MACHINE COUPONS

Paper stock used for the generation of coupons shall be stored in a secure location to prevent unauthorized access, tampering, or theft.

All coupons must be generated using the casino's approved slot monitoring system. The licensee must follow the procedures outlined in the manufacturer's specifications to ensure all coupons are cashable. The casino or outside vendors will be permitted to print or distribute coupons.

The licensee may have the ability to offer separate coupon programs for different events. Several coupon programs can be offered concurrently; however, each program must be separate and distinct from any other program.

Coupons must be printed in a secure location, but may not be printed in the cage. Only licensed supervisors (e.g., marketing manager, gaming managers, etc.) are authorized to generate the various programs and approve the printing of the coupons. Licensed employees granted access to produce slot coupons, cannot be granted access to redeem them.

When using an outside vendor to print and distribute coupons the vendor must:

1. Provide to the licensee proof of security of stock paper storage location, printing location, and data file workflow.
2. Not be allowed any access or privileges whatsoever to the licensee's slot monitoring system.

Other:

3. Processing the data for a coupon event may be completed with an external application and imported into the slot monitoring system for printing.
4. Transfer of data to/from the vendor can be transmitted through File Transfer Protocol (FTP) or put on another type of compatible media.

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5. Access to the FTP site is limited to the licensee's supervisors authorized to generate coupons and the vendor's personnel.
6. FTP site passwords must be changed monthly.
7. Final printed data file must be removed from the FTP site as soon as it is retrieved by the authorized vendor. Any data media file must be returned to the licensee.
8. All coupons must be printed to paper or to final data file.
9. Final data file must be printed to a secure network location. Only individuals authorized to generate coupon events will have access, and no access may be granted to individuals who have rights to redeem coupons.

The following procedures apply whether the licensee is printing or having coupons printed:

1. All coupon series shall be issued in sequential order having a unique validation number.
2. Upon printing the coupons, the system must produce a report that, at a minimum, lists the name and description of the program, validation numbers, number of coupons printed, date and time coupons were printed, name of the individual that printed the coupons, station or location that printed the coupons, the dollar amount of each coupon, and total dollar amount of all coupons. This report may be maintained electronically in the same manner as other supporting reports.
3. The licensee must have procedures in place and is ultimately responsible for ensuring correct amounts are printed, serial numbers are in sequence, and no duplicate coupons were printed or issued.

A licensee must prepare and maintain in its slot monitoring system, for the time period during which the coupon is valid, a listing of all patrons to which a coupon(s) was mailed. The list shall include, at a minimum, the following information:

1. The patron name,
2. The patron address, and
3. The coupon(s) amount(s).

G. TICKET MODULE TESTING REQUIREMENTS

General

All information related to the testing of the TITO module is submitted to the Division via email to CCBHCasinos@spike.dor.state.co.us or CrippleCreekCasinos@spike.dor.state.co.us, as appropriate.

Ticketing modules are subject to, at a minimum, a 30-day testing period. The testing shall be performed in a calendar month.

Licenses must ensure that 100% of TITO devices tested meet the 100% accuracy requirement. Additionally, the licensee must ensure all related system statistical reports are accurate.

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Licensees are required to notify the Division 30 days prior to utilizing the ticketing module of their system. The licensee must complete an electronic copy of the Division's notification of intent to test form. This form, along with the Phase I certification letter provided by the manufacturer, must be forwarded to the Division.

The licensee must review the Initial System and Ticketing Testing Criteria and Helpful Hints, which can be obtained from the Division's web site.

It is recommended that the licensee also review the Slot Monitoring Systems section.

Preparation for Testing

The following criteria must be met in preparation for testing the ticketing module and prior to offering TITO devices for patron play.

A TITO device checklist for each TITO device and a TITO cage validation checklist for each cage validation unit must be completed for each TITO device and validation unit. The checklists must be maintained by the licensee and made available to the Division upon request. Additionally, these checklists are to be completed for all TITO devices and validation units installed subsequent to the initial installation.

Licensees must complete a system questionnaire prior to conducting the testing. The questionnaire can be obtained from the Division's web site.

A ticket must be inserted into every device that is not enabled for ticketing to verify that such devices do not accept tickets. Casinos under common ownership must test **all** machines at the other casino(s) to ensure that the machines will not accept a ticket, as tickets may only be redeemed at the casino from which they were issued. Documentation of this testing must be maintained by the licensee and available to the Division upon request.

Licensees must submit a copy of the front and back of an actual ticket they plan to use.

Licensees must submit a letter electronically to the Division outlining any system limitations indicated on the Phase I certification letter or identified by the licensee and an explanation as to how the licensee is going to address or compensate for the limitations. If no limitations are indicated or identified a letter stating such must be submitted.

Upon completion of all testing performed by the licensee prior to offering the TITO devices for patron play, all test tickets must be removed from the TITO devices, cages, and/or kiosks and voided or cleared out of the system prior to going live with the TITO module.

System Logs

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During ticket testing licensees must create a separate log for various operating groups (e.g., cage, slots, IT, accounting and slot drop/count) to report malfunctions, defects, and investigations occurring during the testing. Each operating group will maintain a separate log for recording problems, malfunctions or defects relating to the functioning of the TITO module. A recap of the information contained in the logs must be forwarded electronically, on a weekly basis, to the Division. A copy of this log is located on the Division's web site.

Slot machine access logs inside each device shall be used to document the reason for access to the machine.

A log of all customer complaints regarding the ticketing module must also be maintained during testing. The log must include the date, time, description of complaint, the names of individuals involved and the resolution.

All system related problems must be documented on a log. See the Slot Monitoring Systems Section of the ICMP for further details regarding documentation of system maintenance, system-related problems, and remote access. A copy of this log is located on the Division's web.

A current, up to date list of all TITO devices must be maintained. This list must include, but is not limited to, the following:

1. Date the device was enabled,
2. Machine number,
3. Manufacturer,
4. Description of game, and
5. Date the device was disabled (if applicable).

Count Machine Testing

Prior to reliance on a count machine that communicates with the TITO system that compares the tickets the system has recorded with the tickets counted during the count process, the licensee must test the counter functionality for two-drop periods. Performing a manual count of the tickets and comparing this count to the system count accomplishes this test. The count functionality passes testing when there are no variances for two consecutive drop periods.

Testing Requirements

Ticketing modules are subject to, at a minimum, a 30-day testing period. The testing shall be performed in a calendar month.

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The voucher-in and voucher-out system meter incrementation must be compared to soft meter incrementation to ensure that system meters are incrementing at the same rate as the soft meters. Licensees must ensure the MCRs are properly completed and mathematically accurate. The MCR is available on the Division's website.

Testing requirements are as follows:

1. Licensee must compare soft meter incrementation to system meter incrementation for voucher-in and voucher-out meters for each TITO device.
2. This comparison must be performed on a drop-to-drop basis until the licensee has determined it has successfully completed the testing of its TITO module.
3. The voucher-in and voucher-out meters must be 100% accurate for each TITO device for each of the drops in the test period in order to pass.
4. Test results must show meter incrementation for each tested meter for each TITO device tested. All TITO machines on the floor must be included in the test.
5. If the licensee changes any meter reading (soft and/or system), the licensee must document the following:
 - (a) Procedures used to investigate the cause of the errant meter reading,
 - (b) Results of the investigation, and
 - (c) Detailed action taken to correct or monitor the meter.
6. The Ticket In Comparison and Ticket Out Comparison reports must be prepared using manual information.
7. The Ticket In Comparison and Ticket Out Comparison reports prepared using system information must be reconciled to the reports prepared using the manual information to verify the accuracy of the system reports.

Note: In order to complete the actual column of the manual Ticket Out Comparison Report, the licensee will use the system Tickets Issued Report.

End of Test Period

Once the licensee determines that the required system testing criteria have been successfully attained, it completes the System Testing Acknowledgement Form Letter. This letter is found on the Division's website.

Upon successful completion of testing, the licensee is no longer required to prepare MCRs. However, soft meters must be recorded each drop period until the submittal of the signed Acknowledgment Letter to the Division. Upon submitting the Acknowledgement letter the licensee records soft meters in conjunction with the last drop

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of the month until such time the Division has reviewed the test results and issued written approval to the licensee to rely on the ticket module. Additionally, the licensee is no longer required to prepare manual statistical reports upon submittal of the Acknowledgment Letter. The licensee must continue to record system problems on the problem logs and report any significant issues immediately to the Division.

Submitting Test Results

Licensees submit the test results per the System Testing Acknowledgement Form Letter. The licensee must have the ability to submit electronically all information requested in an excel format (.xls) to the Division of Gaming at the following email addresses: CCBHCasinos@spike.dor.state.co.us or CrippleCreekCasinos@spike.dor.state.co.us as appropriate. The excel files must contain the formulas.

On-Going Requirements

See Slot Monitoring Systems ICMP section 6 for details on the annual system test requirements.

H. TICKET REDEMPTION KIOSKS

General

A ticket redemption kiosk (kiosk) is a device, which uses bi-directional communication to the ticketing system to validate/redeem tickets or coupons in exchange for cash. It may also serve as a currency changer.

A kiosk checklist for each kiosk must be completed and maintained. The Kiosk Checklist is on the Division's website.

A kiosk must not issue tickets or coupons.

Licensees are required to notify the Division 30 days prior to enabling the ticketing function of the kiosk by submitting, electronically, the kiosk install/upgrade notification form to the Division. The form can be obtained from the Division's web site. The licensee must also forward an electronic copy of the Phase I certification letter provided by the manufacturer. Only kiosks that redeem tickets or coupons require the filing of the notification form with the Division prior to installation.

The licensee shall submit a letter outlining any limitations indicated on the Phase I certification letter or identified by the licensee and an explanation as to how the licensee will address or compensate for the limitations. If no limitations are indicated or identified a letter stating such must be submitted.

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The licensee must ensure that the kiosk has been Phase I tested and certified for the slot monitoring system version used at its casino. The Phase I certification letter for each kiosk will indicate which version(s) of the slot monitoring system(s) the kiosk has been tested with and certified for.

A kiosk must be able to accumulate the total value of all tickets and coupons accepted by the kiosk, referred as Total In meter and must be able to accumulate the total value of all payments issued by the kiosk, referred as the Total Out meter.

Audit procedures of system data in relation to the use of the kiosk, including the reconciliation process, must be documented by the Accounting Department (typically in the required accounting plan).

A kiosk access log must be maintained inside each kiosk. Each person who accesses the kiosk for any defined event shall make an entry on the log. A defined event includes, but is not limited to, the following:

- Service and repairs,
- Clearing stacker and canister jams,
- Tilt resets,
- Hopper and canister fills,
- Drops,
- Troubleshooting error conditions, and
- Kiosk test activity.

Kiosk(s) must be under surveillance coverage.

Any overages or shortages of \$1,000 or more that occurs on a kiosk that is not resolved within seven days are accumulated for the month and reported in writing to the Division's Audit Section by the 5th of the following month. Include a list of the overages/shortages along with the circumstances and results of the investigation for each case. If an overage or shortage involves theft or any indication of unlawful activity, it must be reported to the Division immediately.

All system related problems must be documented on a log. See the Slot Monitoring Systems section for further details regarding documentation of system maintenance, system-related problems, and remote access. A copy of the log is located on the Division's website.

If the kiosk is housed in the same cabinet as an ATM, the two functionalities must be segregated. These cabinets are considered gaming equipment and as such any person accessing the cabinet for any reason must possess a gaming license. Reports from both the kiosk and the ATM are used by accounting to perform the reconciliation.

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Terminology

- Cassette:** A compartment inside the kiosk that contains currency to be dispensed by the kiosk.
- Drop:** The removal of currency, tickets and coupons accepted by the kiosk.
- Hopper:** A compartment inside the kiosk that contains coins to be dispensed by the kiosk.
- Stacker:** A compartment inside the kiosk that contains currency, tickets and coupons accepted by the kiosk.

Key Control

A kiosk must have the following restricted keys:

1. Kiosk door key is maintained in the Gaming Manager locked box 2. In the event two locks are utilized, the second key to access the kiosk is maintained by Security in locked box 1.
2. Stacker release key is maintained in the Security locked box 1.
3. Stacker content key is maintained in the Gaming Manager locked box 2.
4. Stacker rack key is maintained in the Security locked box 1.
5. If only one key is required to access the kiosk; a separate and different key is required to access the cassettes. The kiosk cassette release key is maintained in Security Locked box

See Key Control ICMP section 10 regarding specific key control requirements for the kiosk restricted keys.

Fills

See Cashier ICMP section 9 for the TITO fill procedures.

Drop and Count Procedures

See Tables Games and Slot Drop and Count Procedures ICMP section 5 for kiosk drop and count procedures.

Accounting Procedures

See Accounting ICMP section 11 for kiosk accounting procedures.

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FORMS

Following is a description of the forms discussed in this section. These forms are located on the Division's website at www.revenue.state.co.us/Gaming/home.asp. It is the licensee's responsibility to ensure that all required forms contain the minimum required information and meet ICMP requirements.

Kiosk Checklist

A checklist must be completed for each kiosk and licensees must have procedures in place to ensure that the checklist have been completed and maintained.

Kiosk Install/Upgrade Notification Form

The licensee must submit the kiosk install/upgrade notification form 30 days prior to installing and 14 days prior to upgrading a kiosk.

Notification of Intent to Test Form

Prior to testing a slot monitoring system or TITO module the licensee must complete an electronic copy of the form and submit it to the Division of Gaming.

System Install/Upgrade Notification Form

Prior to installing or upgrading a slot monitoring system or TITO module, licensees must complete an electronic copy of the form and submit it to the Division of Gaming.

System Questionnaire

The licensee must complete an electronic copy of the questionnaire prior to the beginning of testing the system or module of the system. The questionnaire must be updated at the end of the test.

TITO Device Checklist TITO

Licensees are required to complete the TITO device checklist for all TITO devices. These devices must be tested thoroughly prior to being placed into service. A checklist must be completed for all TITO devices and each licensee must have procedures in place to ensure that the required checklists have been completed and maintained.

TITO Cage Validation Checklist

Licensees are required to complete the TITO cage validation checklist for all cage validation units. These cage validation units must be tested thoroughly prior to being placed into service. A checklist must be completed for each cage validation unit, and each licensee must have procedures in place to ensure that the required checklists have been completed and maintained.