

# Segregation of Duties Technical Document

---

Segregation of duties revolves around the principle of least privilege. The principle of least privilege assures that no casino employees have excessive access or functions within a process. Using controls is the most efficient way to achieve segregation of duties. Automated controls such as assigning a set of rights to create a profile and then adding casino employees to the profile are much more effective than manual controls because the software is enforcing the permissions, and other than the initial configuration no human intervention is needed.

Manual controls use review methods' involving one or more employees to ensure the appropriate access has been given to the profile. The review includes system logs, manual logs, reports, and speaking with the owner of the profile.

Each position created in the gaming system by the casino (for example slot tech position) should be reviewed before it is entered into production by a person other than the creator. The positions are created using permissions that are defined by the gaming system manufacturer and understood by the casino. The position must have a written justification for the requesting casino employee from their manager. All manually documented positions must be reviewed and compared to a system generated permissions report. This must be performed at least annually or more often if required by the Division.

The casino should identify employees assigned multiple positions or provides coverage outside their area. The identified casino employees should have written justification for more than one position. The justification should also include casino employee name, assigned positions, and the approver.

Individual user accounts should also be reviewed. Accounts should be checked to see if they are in the appropriate position, and that they have no other unjustified access rights. This could mean being assigned implicitly through a second position, or a subset of rights being explicitly enabled by being applied directly to the account. Employees must be reviewed each time a casino goes through a Segregation of Duties (SOD) review cycle. This review should include at a minimum one user from every position. All of these employees should be listed along with the page number from a system generated detailed report where they are located. The Division may request that every account be reviewed.

The casino must maintain documentation that includes all IT employees, corporate IT, out of state IT personnel, and contractors who have access to the gaming system. The documentation must include full name, title, Colorado gaming license number, and reporting structure. The IT staff must not be able to initiate, perform, override or review any transaction that occurs as a result of gaming activity with the exception of incidents that are documented in the RAMP log and approved by management for fixes and maintenance (please refer to the appropriate section for detailed procedures).