

**Appendix A**  
**Periodic Review Comments**  
**(July 1 - August 31, 2022)**

Date	Name	Rule Number	Rule Title	Support/Oppose	Comment	MO Department of Public Safety Response
8/31/2022	Mike Winter, Executive Director Missouri Gaming Association	11 CSR 45-4.020(7)(A)	Licenses, Restrictions on Licenses, Licensing Authority of the Executive Director, and Other Definitions	Amend this rule	Revise to remove requirements for all positions that need access to the casino floor to perform his or her function or duties to need a Level II Occupational License. This is overly restrictive to require EVS and F&B positions to acquire a MGC license when their job duties do not involve gaming activities nor do they have access to secured areas or sensitive keys.	MGC has reviewed this regulation and is not proposing any revisions at this time.
8/31/2022	Mike Winter, Executive Director Missouri Gaming Association	11 CSR 45-4.260	Occupational Licenses for Class A, Class B, Suppliers and Affiliate Suppliers	Amend this rule	Revise regulations to remove designation of Occupational Class A and Class B licenses and classify solely as Key Person, Level I, and Level II. Current licensing regulations were written before and without the expectation of a casino company operating multiple properties within the jurisdiction. The regulations require a Class B licensee to be assigned to one casino property and restrict access to other properties owned and operated by the parent company. This limits the company's ability to operate efficiently in areas such as Executive Leadership, IT, Finance, Facilities, Hotel Operations, Food & Beverage, and other non-gaming areas.	MGC assumes this comment is directed to 11 CSR 45-4.410 and is continuing to review this rule and may consider making revisions.
8/31/2022	Mike Winter, Executive Director Missouri Gaming Association	11 CSR 45-4.260	Occupational Licenses for Class A, Class B, Suppliers and Affiliate Suppliers	Amend this rule	Consider revising licensing regulations to allow a Class B licensee to have access physical and system access equivalent to their position title at each Class B facility operated by the Class A parent company.	MGC assumes this comment is directed to 11 CSR 45-4.410 and is continuing to review this rule and may consider making revisions.
8/31/2022	Mike Winter, Executive Director Missouri Gaming Association	11 CSR 45-4.260	Occupational Licenses for Class A, Class B, Suppliers and Affiliate Suppliers	Amend this rule	We believe the regulation should be modified to provide flexibility in allowing a licensee to consider hiring applicants who have older felonies that are not relevant to the job being sought.	MGC has reviewed this regulation and is not proposing any revisions as this change is prohibited by 313.812.8, RSMo.

8/31/2022	Mike Winter, Executive Director Missouri Gaming Association	11 CSR 45-4.380	Occupational and Key Person/Key Person Business Entity License Application and Annual Fees	Amend this rule	We suggest changing the length of licenses for Occupational licensees from two years to four years. This will match the time frame of Class A and B license terms. MGC will still have the ability to review licensees if anything should arise during the term of licensing.	MGC has reviewed this regulation and is not proposing any revisions as this change is prohibited by 313.807.2, RSMo.
8/31/2022	Mike Winter, Executive Director Missouri Gaming Association	11 CSR 45-5.050(1)	Authorized Games	Amend this rule	Reconsider the current interpretation or redraft the rule to not prevent promotional activities tied to the outcome of a game such as Jackpot Winner drawings and entries awarded for blackjack. These types of promotions are available in other jurisdictions and are appreciated by patrons. The drawing entry itself does not have a value and should not be considered additional winnings.	MGC has reviewed this regulation and is not proposing any revisions at this time.
8/31/2022	Mike Winter, Executive Director Missouri Gaming Association	11 CSR 45-5.051(2)	Minimum Standards for Blackjack	Not provided	<p>Allow table games management and surveillance to identify and remove advantage players from the casino rather than adjust game play and limits to mitigate the risk. Historically reasoning has been that it is disruptive to games or will slow games down. However, mitigation and countermeasure efforts in fact slow the game much more so than not handling or being allowed to remove an advantage player. This also does not specifically pertain to the use of electronic “cheating” devices. Missouri is possibly the only jurisdiction that does not allow an operator to do this.</p> <p>Be able to back off advantage players, not only use countermeasures. This is an industry standard and consumes numerous people’s time to monitor, communicate and enact the countermeasures, as well as they disrupt other patrons on the table by reducing their playing time.</p>	MGC assumes this comment is directed to 11 CSR 45-5.010 and may consider revising 11 CSR 45-5.010.
8/31/2022	Mike Winter, Executive Director Missouri Gaming Association	11 CSR 45-5.184	Table Game Cards—Receipt, Storage, Inspections, and Removal from Use	Amend this rule	We suggest the card inspection process for Security to be changed. For the cards that are not handled by the players, we ask that Security inspect 5% if less than three hundred decks are used in the gaming day (instead of 10%). We ask that if 300 or more decks are used, at least 2.5% of those decks, but no fewer than 15 decks will be selected at random to be inspected.	MGC has reviewed this regulation and is not proposing any revisions at this time.

8/31/2022	Mike Winter, Executive Director Missouri Gaming Association	11 CSR 45-5.184(7)	Table Game Cards—Receipt, Storage, Inspections, and Removal from Use	Amend this rule	Eliminate the need for shufflers on every Baccarat table. Either create the 8-deck 'vault' in the card and dice room or use the pre-shuffled cards we are purchasing and shuffle once before putting into play. Most jurisdictions do not have shufflers on games where cards are used once then destroyed.	MGC has reviewed this regulation and is not proposing any revisions at this time.
8/26/2022	Shawn Schreiber, Product Compliance Regional Manager IGT	11 CSR 45-5.190(3)	Minimum Standards for Electronic Gaming Devices	Amend this rule	<p>11 CSR 45-5.190 (3) indicates that the limit for the top award on any electronic gaming device shall not be less than 1 in 50 million. IGT suggests aligning with jurisdictions that have moved to the more common observance of advertised awards within 1 in 100 million, unless otherwise denoted to the player, rather than the top award.</p> <p>11 CSR 45-5.190 (3) The probability of obtaining the maximum payout on any electronic gaming device shall not be less than one (1) in fifty (50) million. any explicitly advertised award that is based solely upon chance shall occur at least once in every 100 million games unless otherwise denoted to the player.</p> <p>Updating the odds to align with advertised awards would apply to progressive prizes available on the machine as well. IGT suggests removal of 45-5.200 (10) to support the change and ensure that odds restrictions are consistent.</p> <p>45-5.200 (10) The odds of winning a progressive jackpot shall not be greater than one in fifty million (1:50,000,000) unless specifically approved in writing by the commission.</p>	MGC has reviewed this regulation and is not proposing any revisions at this time.
8/26/2022	Shawn Schreiber, Product Compliance Regional Manager IGT	11 CSR 45-5.200(1)(D)	Progressive Slot Machines	Amend this rule	Defines the Wide-area progressive as a system of gambling games with a progressive jackpot linked across a communication network approved by the commission which connects separate gaming establishments licensed or approved by the commission. IGT suggests consideration for the ability to extend the gaming establishments allowed on a Wide-area progressive link to other jurisdictions that allow multi-jurisdiction operation (e.g., Nevada, New Jersey).	MGC has reviewed this regulation and is not proposing any revisions at this time.

8/26/2022	Shawn Schreiber, Product Compliance Regional Manager IGT	11 CSR 45-5.200(15)(A)	Progressive Slot Machines	Amend this rule	Requires that the licensee authorized to provide a wide-area progressive system maintain in a restricted account a reserve consisting of cash, United States Government Treasury Securities, United States Government Agency Securities and/or Missouri state debt instruments of not less than the sum of the amounts noted in 1. – 2. Based on MGC's acceptance to allow IGT to utilize surety bonds as an approved method, IGT suggests the following language change for consideration: <i>"11 CSR 45-5.200 (15)(A) Maintain in a restricted account a reserve consisting of cash, United States Government Treasury Securities, United States Government Agency Securities, and/or Missouri State debt instruments or via alternate methods as approved by the Commission of not less than the sum of the following amounts:"</i>	MGC has reviewed this regulation and will amend it to specifically allow surety bonds.
8/31/2022	Mike Winter, Executive Director Missouri Gaming Association	11 CSR 45-5.210	Integrity of Electronic Gaming Devices	Amend this rule	Change regulation to allow employees to break seals on EGDs with proper notification. This is currently allowed in other gaming markets.	MGC has reviewed this regulation and is not proposing any revisions at this time.
8/31/2022	Mike Winter, Executive Director Missouri Gaming Association	11 CSR 45-7.030	Required Surveillance Equipment	Not provided	Be able to install wireless camera systems on property in non-gaming areas that would not interface with the current closed gaming Surveillance system.	No change will be made to the regulation. Current regulations do not prohibit the use of wireless cameras on a surveillance system that is completely separate from the required surveillance system.
8/31/2022	Mike Winter, Executive Director Missouri Gaming Association	11 CSR 45-7.170	Access To Areas of Class B Licensee Facilities	Amend this rule	We suggest modifying the regulation to permit access to the pit by Facilities, EVS, etc. when tables are closed. The area is under camera coverage and notification to surveillance would be made to monitor activities. The assets would be secured and it is burdensome to require an escort for general cleaning and routine maintenance.	MGC is continuing to review this rule and may consider making revisions.
8/31/2022	Mike Winter, Executive Director Missouri Gaming Association	11 CSR 45-8.130	Tips and Gifts	Amend this rule	We suggest removing the clause "nonsupervisory capacity" for Slot Supervisors. Processes are in place that prevent the supervisory position from affecting the outcome of an EGD game, such as: EGD CPU, Slot Data System, Surveillance, etc. A Slot Supervisor conducting the same process for an EGD Jackpot should also be allowed to accept a tip/gratuity for their service.	MGC is continuing to review this regulation and may consider making revisions.

8/31/2022	Mike Winter, Executive Director Missouri Gaming Association	11 CSR 45-9.102 Chapter B 1.01	Minimum Internal Control Standards (MICS) - Chapter B Key Controls	Amend this rule		MGC has reviewed this regulation and is not proposing any revisions at this time.
8/31/2022	Mike Winter, Executive Director Missouri Gaming Association	11 CSR 45-9.102 Chapter B 1.05(D)	Minimum Internal Control Standards (MICS) - Chapter B Key Controls	Amend this rule	Consider updating the 72 hour requirement to remove or change employee access following job status or position change. This is often a manual process involving multiple departments. Since the 72 hour requirement could fall over a weekend we request increasing this to 120 hours (5 days).	MGC has reviewed this regulation and is not proposing any revisions at this time.
8/31/2022	Mike Winter, Executive Director Missouri Gaming Association	11 CSR 45-9.103 Chapter C 1.01	Minimum Internal Control Standards (MICS) - Chapter C Rules of the Game	Amend this rule	We suggest the phrase "maximum table payouts" be removed. We question its usage when it "shall not be less than the maximum bet times the maximum odds". In its place we suggest allowing the property to post and aggregate similar to most other gaming jurisdictions.	MGC has reviewed this regulation and will amend to replace existing language with language that prohibits the posting of aggregate maximum table payout limits as patrons should be paid the posted payout odds.
8/31/2022	Mike Winter, Executive Director Missouri Gaming Association	11 CSR 45-9.103 Chapter C 1.02	Minimum Internal Control Standards (MICS) - Chapter C Rules of the Game	Amend this rule	We suggest this be revised to include exceptions for single and double deck blackjack. Doing so would allow Missouri casinos to offer "Pitch" single or double deck blackjack which has been offered in most other jurisdictions.	MGC has reviewed this regulation and is not proposing any revisions at this time.
8/31/2022	Mike Winter, Executive Director Missouri Gaming Association	11 CSR 45-9.104 Chapter D	Minimum Internal Control Standards (MICS) - Chapter D Table Games (Live Games)	Amend this rule	Allow table games to install voucher in / voucher out (VIVO) on tables to accept and print tickets. This would increase the ability to monitor cash flow for Title 31 purposes and decrease the chips walking away from the gaming floor. It is a positive guest enhancement and used in other jurisdictions.	MGC has reviewed this comment and is not proposing any revisions at this time. Further review is necessary to determine the impact on this chapter and on other regulations.
8/31/2022	Mike Winter, Executive Director Missouri Gaming Association	11 CSR 45-9.104 Chapter D 4	Minimum Internal Control Standards (MICS) - Chapter D Table Games (Live Games)	Amend this rule	Request language to allow for the temporary closing of a table game during the gaming day. Table games volume fluctuates based on demand. Often a table may not have any players leaving the options to have a dealer stand at the table or close the game following the procedures in § 4. Request a process to temporarily close a game with the option to reopen later in the day.	MGC has reviewed this regulation and will consider amending to allow for the temporary closing of a table game with modified closing procedures.
8/31/2022	Mike Winter, Executive Director Missouri Gaming Association	11 CSR 45-9.104 Chapter D 10.10	Minimum Internal Control Standards (MICS) - Chapter D Table Games (Live Games)	Amend this rule	We suggest removal of "coupon shall be exchanged for equal value of chips". Coupons should be paid its equal value but not exchanged and then paid. This rule also appears to contradict with provisions in 10.07 which states it cannot be redeemed for chips.	MGC has reviewed this regulation and is not proposing any revisions at this time. The current procedure for paying winning wagers and then exchanging the coupon for an equal value of chips results in the same net effect to AGR as a cheque wager. Since promotional play is taxed in Missouri that is the appropriate process to mirror non-promotional play.

8/31/2022	Mike Winter, Executive Director Missouri Gaming Association	11 CSR 45-9.104 Chapter D 11.02	Minimum Internal Control Standards (MICS) - Chapter D Table Games (Live Games)	Amend this rule	We suggest the last sentence be revised to state "...one or more deck/multi-deck(s) of cards..." This would allow properties that use multi-decks to weigh cases just like single deck process instead of having to open every case. It is not possible to weigh a single deck when packaged as multi-deck pre-shuffled cards.	MGC has reviewed this regulation and is not proposing any revisions at this time. The current regulation can be applied for multi-deck, pre-shuffled cards by using the weight of 52 cards as a threshold.
8/31/2022	Mike Winter, Executive Director Missouri Gaming Association	11 CSR 45-9.104 Chapter D 11.12	Minimum Internal Control Standards (MICS) - Chapter D Table Games (Live Games)	Amend this rule	Request to modify the process for replacement of unsuitable cards when the defects are caused by reasons that do not affect the integrity or fairness of the game, such as a drink spill or other accidental flaw. We request to just replace the card(s) with card(s) from the replacement deck without notification to MGC or completion of a Card/Dice Discrepancy report.	MGC is continuing to review this regulation and may consider making revisions.
8/31/2022	Mike Winter, Executive Director Missouri Gaming Association	11 CSR 45-9.104 Chapter D 11.13	Minimum Internal Control Standards (MICS) - Chapter D Table Games (Live Games)	Amend this rule	We suggest removing "at the table" and allow gaming staff to count down at a pit stand in the same pit area. This process slows down the game for guests and confines a supervisor to that table unless the game is stopped and dealer performs the count.	MGC has reviewed this regulation and is not proposing any revisions at this time.
8/31/2022	Mike Winter, Executive Director Missouri Gaming Association	11 CSR 45-9.104 Chapter D 11.14	Minimum Internal Control Standards (MICS) - Chapter D Table Games (Live Games)	Amend this rule	Request to modify the end of day card and dice collection process to only include used cards and dice. The current process requires all card and dice including sealed and unused decks to return to storage. Modifying the process to only remove used cards and dice to the inspection room and not requiring unused items to be taken back to storage will simplify the process.	MGC has reviewed this regulation and is not proposing any revisions at this time.
8/31/2022	Mike Winter, Executive Director Missouri Gaming Association	11 CSR 45-9.104 Chapter D 13.01 & 13.02	Minimum Internal Control Standards (MICS) - Chapter D Table Games (Live Games)	Amend this rule	Request to revise for flexibility to modify "pit areas" based on business volume and open tables. Throughout the gaming day, tables close based on demand. We would like the flexibility for supervisors to oversee tables in neighboring pits or modify stanchions or barriers to enclose/consolidate pits areas as needed.	MGC has reviewed this regulation and is not proposing any revisions at this time.
8/31/2022	Mike Winter, Executive Director Missouri Gaming Association	11 CSR 45-9.104 Chapter D 15.02	Minimum Internal Control Standards (MICS) - Chapter D Table Games (Live Games)	Amend this rule	Request to remove or reduce the 15-day notification requirement for instructional table games. This limits the availability for consideration of instructional games at events. We suggest reducing to 5 days similar to shipping notification and game move requirements.	MGC has reviewed this regulation and will amend to modify the notification requirement to five (5) days.

8/31/2022	Mike Winter, Executive Director Missouri Gaming Association	11 CSR 45-9.105 Chapter E 1.09	Minimum Internal Control Standards (MICS) - Chapter E Electronic Gaming Devices	Amend this rule	The breaking of seals has been discussed previously. In other gaming markets, employees can break seals with gaming notification. We believe the regulation should be modified to allow the property to call or break the seal in those instance Commission representatives are not readily available. Delays when waiting on MGC to arrive prevents the operator from repairing the machine immediately.	MGC has reviewed this regulation and is not proposing any revisions at this time.
8/31/2022	Mike Winter, Executive Director Missouri Gaming Association	11 CSR 45-9.105 Chapter E 2	Minimum Internal Control Standards (MICS) - Chapter E Electronic Gaming Devices	Amend this rule	Jackpot Payouts – Consider revising language to allow for automated jackpot processing through an approved CMS such as Aristocrat’s Unattended Jackpot feature. Features like this are available in other jurisdictions and allow for slot player to collect their tax forms at the end of a session rather than waiting for an attendant to process each jackpot individually.	MGC has reviewed this regulation and is not proposing any revisions at this time.
8/31/2022	Mike Winter, Executive Director Missouri Gaming Association	11 CSR 45-9.105 Chapter E 2.04	Minimum Internal Control Standards (MICS) - Chapter E Electronic Gaming Devices	Amend this rule	We believe the requirements in 2.04 are overly prescriptive and restrictive. Suggestions for modification include removing requirement to have a 2nd person act as verifier on jackpots less than \$1200, modifying escort requirement to only be required for jackpots over \$15,000 and allow two different employees to verify the jackpot process. This would be one employee for the verification of the jackpot on the EGD and one employee to verify the funds paid to the patron. The present regulation places a burden on casino to have the employee who witnessed the jackpot on the EGD wait until the funds are prepared and paid. This process should be split into two transactions.	MGC is continuing to review this regulation and may consider making revisions.
8/31/2022	Mike Winter, Executive Director Missouri Gaming Association	11 CSR 45-9.105 Chapter E 2.18	Minimum Internal Control Standards (MICS) - Chapter E Electronic Gaming Devices	Amend this rule	We suggest the provision for short pay/no pays should have the threshold increased to at least \$100.	MGC is continuing to review this regulation and may consider making revisions.

8/31/2022	Mike Winter, Executive Director Missouri Gaming Association	11 CSR 45-9.105 Chapter E 4	Minimum Internal Control Standards (MICS) - Chapter E Electronic Gaming Devices	Amend this rule	Testing CPSM isn't required in most markets and has yet to identify any issues in Missouri. Specific to testing machines after a move and not necessarily on initial install. We suggest this be removed due to excessive wait at times to complete GAT resulting in loss of revenue due to failing to get the guests needs taken care of within a reasonable timeframe.	MGC is continuing to review this regulation and may consider making revisions.
8/31/2022	Mike Winter, Executive Director Missouri Gaming Association	11 CSR 45-9.105 Chapter E 5.04	Minimum Internal Control Standards (MICS) - Chapter E Electronic Gaming Devices	Amend this rule	We believe this provision should be removed. In other markets, this testing is not required following a RAM clear. Machine/Software testing – The process is unduly burdensome. MGC requires manufacturers to test and certify equipment but then MGC will do their own review of the software. This creates a burden on the industry while new game software sits waiting to be verified by MGC. We suggest this regulation be reviewed for potential changes to the process.	MGC has reviewed this regulation and is not proposing any revisions at this time.
8/31/2022	Mike Winter, Executive Director Missouri Gaming Association	11 CSR 45-9.105 Chapter E 12.22	Minimum Internal Control Standards (MICS) - Chapter E Electronic Gaming Devices	Not provided	TITO retention of 30 days is unnecessary. Tickets may be disposed of once the audit is complete. We suggest retention should be reduced to weekly and if there is a variance it would be investigated immediately.	MGC is continuing to review this regulation and may consider making revisions.
8/31/2022	Mike Winter, Executive Director Missouri Gaming Association	11 CSR 45-9.106 Chapter F 1.01	Minimum Internal Control Standards (MICS) - Chapter F Poker Room	Amend this rule	We suggest removing the requirement that poker must be played in an approved poker room. This would allow smaller properties flexibility to have tables in their pit area so long as a poker bank is not used. This may allow smaller properties to offer this as another gaming option for their guests.	The existing regulation already allows other proposals to be considered. No change is needed to address this comment.
8/31/2022	Mike Winter, Executive Director Missouri Gaming Association	11 CSR 45-9.106 Chapter F 3	Minimum Internal Control Standards (MICS) - Chapter F Poker Room	Amend this rule	Allow high hands, special hands, and tournament payouts to be paid from the poker table. The requirement to have a security officer escort the paperwork from the table to the bank and back is overly burdensome and inconvenient for patrons. Paperwork could be maintained in the chip tray and transferred at the end of the shift to the bank to re-impress the chip tray.	MGC has reviewed this regulation and is not proposing any revisions at this time.
8/31/2022	Mike Winter, Executive Director Missouri Gaming Association	11 CSR 45-9.106 Chapter F 5 & 6	Minimum Internal Control Standards (MICS) - Chapter F Poker Room	Amend this rule	This is an excessive process to store chips for a few hours while a table layout is replaced. Consider revising to allow the chips to remain in a locked float or stored until the float can be reinstalled.	These rules are necessary for adding poker room tables and removing poker room tables.  MGC may consider adding procedures to the chapter for changing table layouts.



8/31/2022	Mike Winter, Executive Director Missouri Gaming Association	11 CSR 45-9.106 Chapter F 8.05	Minimum Internal Control Standards (MICS) - Chapter F Poker Room	Amend this rule	Consider revising to remove the requirement to change cards out every six hours to as needed but at least at the end of each gaming day.	MGC is continuing to review this regulation and may consider making revisions.
8/31/2022	Mike Winter, Executive Director Missouri Gaming Association	11 CSR 45-9.107 Chapter G 5.01(B)	Minimum Internal Control Standards (MICS) - Chapter G Drops and Counts	Amend this rule	We suggest the drop provisions be changed to 1 full drop per month. The labor needed for more drops is very difficult in this job market.	MGC has reviewed this regulation and is not proposing any revisions at this time. The closing of the casino floor once a week allows for the reconciling of the turnstile counts and allows the taxes to be accurately collected without relying on estimates.
8/31/2022	Mike Winter, Executive Director Missouri Gaming Association	11 CSR 45-9.107 Chapter G	Minimum Internal Control Standards (MICS) - Chapter G Drops and Counts	Amend this rule	We suggest modifying the regulation to full 24-hour gaming with no mandatory requirement to close. Requiring the floor to be closed results in a loss of revenue to the state, the property and guest dissatisfaction.	MGC has reviewed this regulation and is not proposing any revisions at this time.
8/31/2022	Mike Winter, Executive Director Missouri Gaming Association	11 CSR 45-9.107 Chapter G 5.05	Minimum Internal Control Standards (MICS) - Chapter G Drops and Counts	Amend this rule	We suggest the five-foot rule be rescinded to more closely match regulations in other jurisdictions. For instance, Nevada does not require a guest to leave their machine during the drop.	MGC is continuing to review this regulation and will consider revising MICS, Chapter G §5.04 and §5.06.
8/31/2022	Mike Winter, Executive Director Missouri Gaming Association	11 CSR 45-9.107 Chapter G 5.13	Minimum Internal Control Standards (MICS) - Chapter G Drops and Counts	Amend this rule	Allow slot technicians to repair BV cans on the casino floor instead of the requirement to perform an emergency drop. The spring in BV cans often get dislodged when entered into the game or are not set in correctly causing a full BV can alert to shut down the EGD. This is a simple fix and should not require an emergency drop. The slot technician is escorted by security and monitored by surveillance when entering the EGD. Technicians are allowed to remove bills/TITO to identify last 5 stacked in the can, why is it prohibited to remove the whole stack to reset the spring.	MGC has reviewed this regulation and is not proposing any revisions at this time.

8/31/2022	Mike Winter, Executive Director Missouri Gaming Association	11 CSR 45-9.107 Chapter G 5.13	Minimum Internal Control Standards (MICS) - Chapter G Drops and Counts	Amend this rule	Allow slot technicians to be permitted in the drop zone while the drop is performed. The slot technicians assist with fixing door alarms, BV doors, and EGD Tilts. Stopping the drop and clearing the area to allow a technician to repair an EGD is overly burdensome and not necessary to ensure the security of the area when BV cans are removed. The BV cans are locked and monitored by surveillance and security.	MGC is continuing to review this regulation and will consider revising MICS, Chapter G §5.03 to expand the reasons slot technicians are allowed in the drop zone.
8/31/2022	Mike Winter, Executive Director Missouri Gaming Association	11 CSR 45-9.107 Chapter G 7.10	Minimum Internal Control Standards (MICS) - Chapter G Drops and Counts	Not provided	<p>We believe these provisions are overly restrictive. Licensees should be permitted to allow the count team members to remove their hands from or return them to a position on or above the count table or other work surface, where funds are exposed, without requiring them to hold out and expose the backs and palms of their hands to other members of the count team and the surveillance cameras, with the exception of before and after going to their body.</p> <p>The count team members have innumerable opportunities during the normal course of the count process to remove their hands from or return them to a position on or above the count table or other work surface where funds are exposed, and the requirement to clear their hands to other members of the count team and the surveillance cameras is excessive.</p> <p>All contents removed from each drop device shall remain on or above the count table or other work surface in plain view of surveillance until transferred to transport carts. If contents are accidentally dropped on the floor, the count team member shall clear their hands before picking up the contents and after returning the contents to the table. Count team members will be required to clear their hands before and after going to their body.</p>	MGC has reviewed this regulation and is not proposing any revisions at this time.

Additionally, we believe the following requirements defined in MICS Chapter G mitigate the risk of unauthorized removal of drop funds from the count room:

4.12, non-transparent containers, other than currency/TITO/chip transport carts, may only be permitted in the count room and cart storage room if they are not placed within five feet of any currency in the room and they are inspected by a security officer upon removal from the room;

4.07, each individual who enters the count room, except security, main bank cashier, internal/external auditors, and MGC personnel, shall wear an authorized one-piece, pocketless jumpsuit, as supplied by the Class B Licensee;

4.08, once the count has begun any person exiting the count room, for any reason other than to complete the drop, shall remove his or her jumpsuit. A security officer shall observe the individual removing the jumpsuit to detect any assets that may have been concealed on the employee's person. The jumpsuit shall be removed in the mantrap outside the count room or other area directly outside the count room door;

4.02, a security officer shall inspect all containers, equipment, paperwork, and other items being removed from the count room or cart storage room; except for locked storage carts.

					<p>6.02, a security officer present at the count room door or a count team member present in the count room shall notify Surveillance prior to any person entering or leaving the count room. Surveillance shall document on the Surveillance Shift Log the time and the number of persons entering or leaving. The only exception is when a drop team member is entering or leaving the count room with security escort when delivering drop carts;</p> <p>6.04, all items including paperwork removed from the count room shall be immediately inspected for casino assets by a security officer;</p> <p>7.02, Surveillance shall continuously monitor and record the count process from the time the count team enters the room until the buy is completed. (11 CSR 45-7.040);</p> <p>8.03, the main bank cashier’s documentation shall remain with the cashier for inspection by a security officer upon exiting the count room through the primary door;</p> <p>8.04, after each count, all count documentation, including any applicable computer storage media, final count report, tickets, coupons, counter check issue slips, and all supporting documents shall be inspected by a security officer and immediately delivered to Accounting in a tamper-resistant sealed container or a locked transport cart that is only accessible by Accounting. Alternatively, the documents shall be adequately</p>	
8/31/2022	Mike Winter, Executive Director Missouri Gaming Association	11 CSR 45-9.107 Chapter G 8.02	Minimum Internal Control Standards (MICS) - Chapter G Drops and Counts	Not provided	The lead count room representative shall ensure that surveillance is notified when the count is complete. We suggest any count employee be allowed to make the call to surveillance.	The existing regulation already allows any count team member to notify surveillance. It places the responsibility for ensuring this notification on the lead count room representative. No change is needed to address this comment.
8/31/2022	Mike Winter, Executive Director Missouri Gaming Association	11 CSR 45-9.108 Chapter H 14.07	Minimum Internal Control Standards (MICS) - Chapter H Casino Cashiering	Amend this rule	Eliminate the requirement to investigate all missing items, specifically slot voucher thefts / abandonments under \$25. It places an undue workload on slots, security and Surveillance when smaller amounts are involved. Other considerations could be made like slot free play given to the patrons at the discretion of slots.	MICS, Chapter H §14.07 does not require an investigation of missing items. No change is needed to address this comment.

8/31/2022	Mike Winter, Executive Director Missouri Gaming Association	11 CSR 45-9.109 Chapter I 8.02(H)(7)	Minimum Internal Control Standards (MICS) - Chapter I Casino Accounting	Not provided	The reference to "verify the required information is recorded on the back of the photo" is outdated and conflicts with Chapter K 4.07, which states "...If a clear copy of photo identification is not available, Surveillance shall be notified prior to the completion of the qualifying transaction and the surveillance employee shall obtain at least one photograph of the patron from the surveillance camera. The surveillance photo of the patron shall be kept on file with the CTR. The photograph or the image file shall be labeled with the patron's name...."	MGC is continuing to review this regulation and may consider making revisions.
8/31/2022	Mike Winter, Executive Director Missouri Gaming Association	11 CSR 45-9.109 Chapter I 12.02	Minimum Internal Control Standards (MICS) - Chapter I Casino Accounting	Amend this rule	Allow patrons to create a player reward account anywhere including on-line and at kiosks. A card could not be provided unless they provide identification that is scanned in and retained on file. This is common in many gaming jurisdictions. On-line enrollment for accounts is widely used in many financial and age regulated entertainment industries. The new DAP process allows on-line enrollment but prohibits patrons from establishing accounts. We believe the regulation is out dated and should be considered for modification.	MGC is continuing to review this regulation and may consider making revisions.
8/31/2022	Mike Winter, Executive Director Missouri Gaming Association	11 CSR 45-9.109 Chapter I 13.03	Minimum Internal Control Standards (MICS) - Chapter I Casino Accounting	Amend this rule	Request ability for Cage Team Members to modify/adjust accounts – issue discretionary/guest appeasement FSP, adjust accounts for outages (planned & unplanned). Employees that issue player cards currently can't award/adjust anything due to separation of duties. These team members are in player services positions and should be allowed to handle service recoveries and guest appeasements as needed.	MGC has reviewed this regulation and is not proposing any revisions at this time.

8/31/2022	Mike Winter, Executive Director Missouri Gaming Association	11 CSR 45-9.110 Chapter J 1.04	Minimum Internal Control Standards (MICS) - Chapter J Admissions and Ticketing	Amend this rule	We suggest rescinding the requirement for two sets of turnstiles with two separate reporting systems and an added manual process. Expectation is 100% accuracy when manufacturer has a 2% deviation rate. Properties pay on the higher of the two counts so the proper amount of admission fee revenue paid to the state is insured. Doing so would reduce the industry's regulatory burden but still insure proper tax revenue to the state.	The existing regulation already allows an alternative method for obtaining the readings for each session to be approved by MGC. No change is needed to address this comment.
8/31/2022	Mike Winter, Executive Director Missouri Gaming Association	11 CSR 45-9.111 Chapter K	Minimum Internal Control Standards (MICS) - Chapter K Currency Transaction Reporting	Rescind this rule	Consideration should be given to rescind this entire chapter due to properties already complying with federal regulations and being subject to examinations. Missouri's standards should align with the federal regulations.	MGC is continuing to review this regulation and will consider revising MICS, Chapter K to eliminate any duplicative standards.
8/31/2022	Mike Winter, Executive Director Missouri Gaming Association	11 CSR 45-9.113 Chapter M 4.01	Minimum Internal Control Standards (MICS) - Chapter M Surveillance	Not provided	While we acknowledge the changes made to surveillance staffing regulations we continue to believe a property should be allowed to determine staffing based on business levels and eliminate a firm 'number' of people at all times. This would give the properties flexibility in staffing for busy and slower times.	MGC has reviewed this regulation and is not proposing any revisions at this time.
8/31/2022	Mike Winter, Executive Director Missouri Gaming Association	11 CSR 45-9.114 Chapter N 5.03	Minimum Internal Control Standards (MICS) - Chapter N Security	Amend this rule	Increase the amount of funds that can be transferred by employees across the casino floor without a security escort. The current limit of \$100 is overly burdensome and delays many small transactions from being completed in a timely fashion impacting patron wait times while removing security from monitoring the floor. Licensed employees should be trusted to move more than \$100 from one location to another especially with surveillance notification. Slot jackpots less than \$5,000 are excluded from requiring a security escort, poker and table games payouts less than \$5,000 should also be considered.	MGC is continuing to review this regulation and may consider making revisions.

8/31/2022	Mike Winter, Executive Director Missouri Gaming Association	11 CSR 45-9.117 Chapter Q 2.01	Minimum Internal Control Standards (MICS) - Chapter Q Disassociated Persons	Not provided	Consider development and implementation of an application programming interface (API) to allow casinos external read-only access to the MGC Missouri DAP List. This will allow each casino to build their own processes around the API to automatically pull the contents of the MGC DAP List in their casino management systems. Use of an API will allow more accurate, direct access to MO DAP data in real-time. Current regulations require a weekly download of DAP data for updating property systems and distribution to required team members. Properties can provide additional details on further benefits and potential costs to develop and implement the API.	The existing system already allows a casino to access the information in real time. MGC is continuing to review this regulation and may consider making revisions.
8/31/2022	Mike Winter, Executive Director Missouri Gaming Association	11 CSR 45-9.117 Chapter Q 2.01	Minimum Internal Control Standards (MICS) - Chapter Q Disassociated Persons	Amend this rule	Consider revising the steps required for downloading and checking the MO DAP List to allow casinos direct access to the DAP data to pull and update to the casino's universal system. Current regulations require manual flagging of patron accounts in the casino player tracking system after downloading data from the MGC server. Most company Responsible Gaming Programs honor out of state exclusions and require team members to search the MGC DAP List as described in Chapter Q 2.05 in addition to checking the patron account in the casino's player tracking system. Allowing direct connection capabilities to the MGC DAP server to pull into player tracking systems will eliminate the need for team members to check DAP status in multiple systems, reduce human error when manually flagging accounts in casino player tracking systems, and reduce audit discrepancies caused by the required steps to download DAP data and flag accounts.	MGC is continuing to review this regulation and may consider making revisions.
8/31/2022	Mike Winter, Executive Director Missouri Gaming Association	11 CSR 45-9.118 Chapter S 3.03	Minimum Internal Control Standards (MICS) - Chapter S Management Information Systems	Amend this rule	Consider updating the 72 hour requirement to remove or change employee access following job status or position change. This is often a manual process involving multiple department . Request increasing this to 120 hours (5 days).	MGC has reviewed this regulation and is not proposing any revisions at this time.

8/31/2022	Mike Winter, Executive Director Missouri Gaming Association	11 CSR 45-9.118 Chapter S 3.04	Minimum Internal Control Standards (MICS) - Chapter S Management Information Systems	Amend this rule	Remove requirement to maintain a list of network jacks or ports accessible to public. Maintaining a list is not necessary if we are only provisioning ports that are in-use.	MGC has reviewed this regulation and is not proposing any revisions at this time.
8/31/2022	Mike Winter, Executive Director Missouri Gaming Association	11 CSR 45-9.118 Chapter S 3.05	Minimum Internal Control Standards (MICS) - Chapter S Management Information Systems	Amend this rule	Requiring all communication closets to have dedicated surveillance coverage and locked with sensitive key or proximity card is excessive and expensive to manage. We suggest to maintain dedicated surveillance coverage and keep the doors locked when not in use.	MGC has reviewed this regulation and is not proposing any revisions at this time.
8/31/2022	Mike Winter, Executive Director Missouri Gaming Association	11 CSR 45-9.118 Chapter S 5.06	Minimum Internal Control Standards (MICS) - Chapter S Management Information Systems	Amend this rule	Same as above. Increase 72 hour requirement to 120 hours.	MGC has reviewed this regulation and is not proposing any revisions at this time.
8/31/2022	Mike Winter, Executive Director Missouri Gaming Association	11 CSR 45-9.118 Chapter S 7.01	Minimum Internal Control Standards (MICS) - Chapter S Management Information Systems	Not provided	Requiring system accounts to be changed anytime post implementation is a dangerous, unnecessary, and sometimes un-supported practice with current technologies. Most systems are not designed to change credentials for these accounts without major impact. The requirement to change these passwords post-implementation should be removed and replaced with requirements to establish complex passwords and manage them in a proper Privileged Access Management (PAM) system that manages access and logs activity. There is more risk to the business requiring these password changes than not.	MGC is continuing to review this regulation and may consider making revisions.  This regulation was recently revised and no longer requires the password to be changed post implementation.
8/31/2022	Mike Winter, Executive Director Missouri Gaming Association	11 CSR 45-9.119 Chapter S 7.01(B)	Minimum Internal Control Standards (MICS) - Chapter S Management Information Systems	Amend this rule	Request to extend the requirement to change service account passwords following termination of an employee with access to modify service accounts from one day to 3 days.	MICS, Chapter S §7.01(B) was removed from the chapter, effective 9/30/2022.  MGC has reviewed this regulation and is not proposing any revisions at this time.
8/31/2022	Mike Winter, Executive Director Missouri Gaming Association	11 CSR 45-9.119 Chapter S 17.03	Minimum Internal Control Standards (MICS) - Chapter S Management Information Systems	Amend this rule	Same as above. Increase 72 hour requirement to 120 hours.	MGC has reviewed this regulation and is not proposing any revisions at this time.



8/31/2022	Mike Winter, Executive Director Missouri Gaming Association	11 CSR 45-9.120 Chapter T 1.02	Minimum Internal Control Standards (MICS) - Chapter T Tips	Amend this rule	We suggest this be revised to allow for security staff to accept tip and gratuities. In numerous instances security staff perform services to guests who would like to offer them a tip. This provision in Chapter T and 11 CSR 45-8.130 would need to be amended to provide this opportunity to security staff.	MGC has reviewed this regulation and is not proposing any revisions at this time.
8/31/2022	Mike Winter, Executive Director Missouri Gaming Association	11 CSR 45-9.120 Chapter T 4.01(C)	Minimum Internal Control Standards (MICS) - Chapter T Tips	Amend this rule	We suggest removing this provision. Doing so would allow a property to write in manual shuffle procedures when a shuffler goes down if they elect to allow individual poker tips. This would assist in instances of mechanical issues.	MGC has reviewed this regulation and is not proposing any revisions at this time.
8/31/2022	Mike Winter, Executive Director Missouri Gaming Association	11 CSR 45-9.120 Chapter T 4.01(E)	Minimum Internal Control Standards (MICS) - Chapter T Tips	Amend this rule	Consider removing references to daily count out of poker dealer tips. Dealer tip containers are secured in a locked storage area under constant surveillance coverage. The same tip container can be used by the dealer through the pay week and counted when full or at the end of the pay cycle for payroll and tax reporting purposes.	MGC is continuing to review this regulation and may consider making revisions.
8/31/2022	Mike Winter, Executive Director Missouri Gaming Association	11 CSR 45-9.120 Chapter T 4.03(B)	Minimum Internal Control Standards (MICS) - Chapter T Tips	Not provided	This has been addressed in the past but wanted to re-visit. Eliminate the calls to Surveillance when poker dealers take their locked token box from the poker podium to the main bank. The box is not unlocked until it gets to the main bank so it is not really a token collection until the main banker opens the box. We are not notified every time a dealer moves from table to table or takes the token box in and out of the podium during their shift. I think poker is onboard with eliminating this too.	MGC is continuing to review this regulation and may consider making revisions.

8/31/2022	Mike Winter, Executive Director Missouri Gaming Association	11 CSR 45-10.030	Licensee's Duty to Report and Prevent Misconduct	Amend this rule	Along the same lines as our comment in Chapter H 14.07, please further define or add exclusions to the licensee's duty to report and prevent misconduct to exclude "ticket thefts." Based on the interpretation of "knows or should have known" that an illegal act has been committed on the premises and what constitutes a theft, the properties are spending a tremendous amount of time and resources each day tracking down lost ticket claims. For example if a patron leaves behind credits or drops their ticket, money, personal items and reports it to casino staff, the expectation is the casino launches a full investigation and reports to the local agents. The investigation takes surveillance, security, cage/casino operations resources. In any other industry, if a patron drops \$20 on the floor and reports it to the staff, the response is most likely sorry but someone must have picked it up. Casinos monitor and address criminal activity of someone looking for abandoned funds or actual stealing from another person, but the vast majority of "ticket theft" investigations involve a patron abandoning or misplacing their property.	MGC has reviewed this regulation and is not proposing any revisions at this time.
8/31/2022	Mike Winter, Executive Director Missouri Gaming Association	11 CSR 45-11.060(2)	Season Tickets, Complimentary Tickets and Fee-Free Passes	Amend this rule	Amend this rule to allow all employees of the licensee to have access to the casino floor on a fee free basis.	This requirement is also found in section 313.820, RSMo. MGC has reviewed this regulation and is not proposing any revisions.
8/31/2022	Mike Winter, Executive Director Missouri Gaming Association	11 CSR 45-12.090(11)	Rules of Liquor Control	Amend this rule	Revise to remove restrictions on product displays and promotional items such as glassware, signage, etc received from licensed liquor vendors for use in bar and restaurant areas. Current regulations set a limit for total cost of items given or sold to a retail business.	MGC is continuing to review this regulation and may consider making revisions.
8/16/2022	MO Gaming Commission Staff	11 CSR 45-30.090	Additional Information	Amend this rule	Consider adding language to address a foreign national assisting with bingo.  We had a situation arise where a gentleman had a driver license and a passport but has never obtained a SSN.	MGC is continuing to review this regulation and may consider making revisions.

8/29/2022	Roger Hoffman, Knights of Columbus 9533	11 CSR 45-30.370(3)	Progressive Games	Amend this rule	<p>For the progressive rules where it states they can start at no more than \$1000, we would like that changed to \$3000. This would allow us to get to \$9000/53 numbers 8 weeks sooner.</p> <p>We make a big percentage of our annual net \$ in the 3 weeks after reaching the \$9000/53 point, drawing a much bigger attendance. This would benefit everyone currently conducting a progressive in a similar manner.</p> <p>Currently some bingos are using the rule of progressive to have a \$1000 game weekly, advertising progressive as \$1000/70 numbers. This will be won every week 99.999% of the time.</p> <p>I would not want the \$3000 limit used to have a \$3000 weekly game in this manner some further rule modification would be needed if our \$3000 proposal is accepted.</p> <p>Thank you for considering this.</p>	MGC is continuing to review this regulation and may consider making revisions.
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