Rules of
Department of Public Safety
Division 45—Missouri Gaming Commission
Chapter 9—Internal Control System

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11 CSR 45-9.010 Definition of Licensee

PURPOSE: This rule establishes definitions for this chapter.

(1) For purposes of this chapter, licensee shall mean the holder of a Class A license.

AUTHORITY: sections 313.004, 313.800, 313.805, 313.812 and 313.817, RSMo 1994.*


11 CSR 45-9.020 Objectives of an Internal Control System

PURPOSE: This rule establishes the objectives of an internal control system.

(1) Each licensee shall establish an internal control system that includes the following:

(A) Administrative control which includes, but is not limited to, the plan of organization and the procedures and records that are concerned with the decision processes leading to management’s levels of authorization of transactions.

(B) Accounting control which includes the plan of organization and the procedures and records that are concerned with the safeguarding of assets and the accuracy and reliability of financial records and are consequently designed to provide reasonable assurance that—

1. Transactions are performed only in accordance with management’s specific or general authorization;

2. Transactions are recorded adequately to permit preparation of financial statements in conformity with generally accepted accounting principles, to permit proper reporting of adjusted gross receipts and of fees and taxes and to maintain accountability for assets;

3. Access to assets is permitted only in accordance with management’s specific authorization;

4. Recorded accountability for assets is compared with actual assets at reasonable intervals and appropriate action is taken with respect to any discrepancies;

5. Functions, duties and responsibilities are appropriately segregated and performed by competent personnel with integrity and an understanding of prescribed procedures.

A. The internal auditor shall report only to the entity or person holding a Class A license, or other reporting as approved by the commission.

B. Security personnel shall only report to an organizational level above that of gaming operations manager.

C. Surveillance personnel shall only report directly to an organizational level above that of general manager; and

6. Compliance with the statutes and rules is assured.

AUTHORITY: sections 313.004, 313.800, 313.805, 313.812 and 313.817, RSMo 1994.*


11 CSR 45-9.030 Minimum Internal Control Standards

PURPOSE: This rule establishes minimum internal control standards.

PUBLISHER’S NOTE: The secretary of state has determined that the publication of the entire text of the material which is incorporated by reference as a portion of this rule would be unduly cumbersome or expensive. This material as incorporated by reference in this rule shall be maintained by the agency at its headquarters and shall be made available to the public for inspection and copying at no more than the actual cost of reproduction. This note applies only to the reference material.

The entire text of the rule is printed here. This incorporated material (Appendix A) may also be accessed at http://www.mgc.dps.mo.gov

(1) The commission shall adopt and publish minimum standards for internal control procedures that in the commission’s opinion satisfy 11 CSR 45-9.020, as set forth in Appendix A, which has been incorporated by reference herein, as published by the Missouri Gaming Commission, 3417 Knipp Dr., PO Box 1847, Jefferson City, MO 65102. This rule does not incorporate any subsequent amendments or additions. The minimum internal control standards were published by the commission in 2005 and do not include any later amendments or additions.


11 CSR 45-9.040 Commission Approval of Internal Control System

PURPOSE: This rule establishes the procedures for approval of internal control system.

(1) Each licensee shall describe, in a manner that the commission may approve or require, its administrative and accounting procedures.
in detail in a written system of internal control. Each written system must include a detailed narrative description of the administrative and accounting procedures designed to satisfy the requirements of 11 CSR 45-9.020 and 11 CSR 45-9.030(1). Additionally, this description shall include a separate section for the following:

(A) An organizational chart depicting appropriate segregation of functions and responsibilities;
(B) A description of the duties and responsibilities of each position shown on the organizational chart;
(C) A detailed, narrative description of the administrative and accounting procedures designed to satisfy the requirements of 11 CSR 45-9.020 and 11 CSR 45-9.030(1). Additionally, this description shall include a separate section for the following:

1. Procedures to account for the total number and amount of money received from admissions, including free passes or complimentary admission tickets;
2. Procedures for opening and closing gaming tables;
3. Procedures for transporting chips and tokens to and from gaming tables;
4. Procedures for shift changes at gaming tables;
5. Drop bucket characteristics;
6. Transportation of drop buckets to and from electronic gaming devices;
7. Procedures for chip and token purchases;
8. Procedures for hopper fills;
9. Procedures for transportation of electronic gaming devices;
10. Procedures for jackpot payout;
11. Layout and physical characteristics of cashier’s cage;
12. Procedures for accounting controls;
13. Procedures for exchange of checks submitted by gaming patrons;
14. Procedures for credit card and debit card transactions;
15. Procedures for acceptance, accounting for and redemption of patron’s cash deposits;
16. Procedures for control of coupon redemption and other complimentary distribution programs;
17. Procedures for shoreside facilities, which is defined for purposes of this rule as those facilities based or built upon land;
18. Procedures for federal cash transactions reporting; and
19. Procedures for security and accountability of dice and cards; and
20. Other items as the commission may require.

(2) At least ninety (90) days before the riverboat gambling operation commences, unless otherwise directed by the commission, each licensee shall submit to the commission a written description of its internal control system, which is designed to satisfy the requirements of section (1) of this rule.

(3) If the written system is the initial submission to the commission, a letter shall be submitted from an independent certified public accountant selected by the commission stating that the licensee’s written system has been reviewed by the accountant and complies with the requirements of section (1) of this rule.

(4) The commission shall review each submission required by section (2) of this rule and shall determine whether it conforms to the requirements of section (1) of this rule and whether the system submitted provides adequate and effective controls for the operations of the licensee. If the commission finds any insufficiencies, they shall be specified in writing to the licensee, who shall make appropriate alterations. No licensee shall commence gaming operations unless and until a system of controls is approved.

(5) The licensee may not implement a system of internal control procedures that does not satisfy the minimum standards unless the commission, in its sole discretion, determines that the licensee’s proposed system satisfies 11 CSR 45-9.020 and approves the system in writing. Within thirty (30) days after a licensee receives notice of the commission’s approval of procedures that satisfy the requirements of 11 CSR 45-9.020 but that do not satisfy the minimum standards, the licensee shall comply with the approved procedures, amend its written system accordingly, and submit to the commission a copy of the written system as amended and a written description of the variations.


11 CSR 45-9.060 Lack of Compliance with Chapter Requirements

PURPOSE: This rule establishes the process if licensee fails to comply with internal control system.

(1) If the commission or director determines that a licensee’s administrative or accounting procedures or its written system does not comply with the requirements of this chapter or require improvement, the commission or director shall notify the licensee in writing. Within fifteen (15) days after receiving the notification, the licensee shall amend its procedures and written system accordingly and shall submit a copy of the written system, as amended, and a description of any other remedial measures taken.

(2) Failure to comply with the provisions of this chapter is an unsuitable method of operation.

(3) Violations of the minimum internal control standards by a Class A licensee or an agent or employee of a Class A licensee are deemed to be unsuitable conduct for which the Class A licensee and/or its agent or employee is subject to administrative penalty pursuant to section 313.805(6), RSMo and 11 CSR 45-1 et seq., as amended from time-to-time. Any agent or employee of a Class A licensee that is involved in a violation of the minimum internal control standards may be subject to fine, discipline or license revocation.

(4) Violations of the Class A licensee’s internal control system by the Class A licensee or an agent or employee of the Class A licensee shall be prima facie evidence of unsuitable conduct for which the Class A licensee and/or its agents or employees may be subject to discipline pursuant to section 313.805(6), RSMo and 11 CSR 45-1 et seq., as amended from time-to-time.
