

Santa Clara Pueblo Gaming Commission



Public Safety Regulations

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CHAPTER III – MINIMUM INTERNAL CONTROL STANDARDS

SECTION 16: PUBLIC SAFETY

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CHAPTER III – MINIMUM INTERNAL CONTROL STANDARDS

SECTION 16: PUBLIC SAFETY

16.1 Purpose. The purpose of these regulations is to require for the Gaming Operation to develop System of Internal Control Standards (“SICS”) for the conduct of the Public Safety operations that are in compliance with Compact. The requirements outlined in this Section supplement and are intended to be interpreted and applied to existing regulations Chapter III Minimum Internal Control Standards.

16.2 Authority. The Commission has authority to regulate and to promulgate and enact Regulations pursuant to delegated authority from the Santa Clara Pueblo Tribal Council and the Santa Clara Pueblo Gaming Code. In addition, the Tribal-State Gaming Compact for the regulation of Class III Gaming between the Pueblo of Santa Clara and the State of New Mexico sets out responsibilities to be carried out by the Santa Clara Pueblo Gaming Commission.

16.3 Supervision. Supervision must be provided as needed for Public Safety operations by an employee(s) with authority equal to or greater than those being supervised. The direct supervision of one family member over another on the same shift is prohibited. The same prohibition applies in the verification of funds or any other time a standard or procedure calls for an independent verification or transaction. Family members include the employee’s spouse, sibling, child, parent, direct in-laws, grandparent, grandchild, or domestic partner.

16.4 Computer Applications.

(1) For any computer applications utilized, alternate documentation and/or procedures that provide at least the level of control described by the standards in this section, as approved by the Commission, will be acceptable.

- (a) All computer application passwords must remain confidential to the individual user and not be shared.
- (b) Work spaces that are shared simultaneously require all employees to lock the computer screen (e.g. ctrl+alt+delete) or log off of the computer/application before leaving the work area.
- (c) In work spaces that are not shared simultaneously, the computer/application must be secured by locking the computer screen (e.g. ctrl+alt+delete) or securing the work area by locking the door.
- (d) Any employee working on a computer/application must do so using their individually-assigned credentials.
- (e) Generic usernames and/or passwords may only be utilized with prior approval from the Information Technology Department and the Commission.
- (f) The department Manager or designated employee shall be responsible for immediately notifying (via email) Information Technology Department, Human Resources Department, Key Custodian, Compliance Department and Surveillance Department when a transfer or termination occurs.

- (g) All access rights to computer applications, Key Badge Access and key box systems must be updated accordingly by the responsible department within seventy-two (72) hours of notification.

16.5 Standard Operations.

- (1) The Public Safety Department operating procedures are to be implemented at any facility that contain gaming machines or devices.
- (2) The Public Safety Department operation procedures may be modified per site due to the various tier levels of Gaming Operations and the corresponding MICS/TICS requirements.
- (3) Any modifications from the standard operating procedures must be documented and approved by the Gaming Operation and submitted to the Commission.
- (4) The Public Safety Department shall strive to ensure staff is trained in the day-to-day operational procedures of the site in order to efficiently and securely conduct business.
- (5) Access to the Public Safety offices shall be limited to Public Safety Officers and designated authorized employees.
- (6) Public Safety shall maintain a Sign-In Log (if a computerized system is not in use) of all visitors (including employees who work at other Santa Clara entities), entering the non-public areas of the Gaming Operation, who are not employed with the facility. Employees with access to all facilities (including the Commission) shall be exempt from signing this log. Anytime a visitor or vendor arrives at the facility or a temporary badge is issued by the Public Safety Department, appropriate information shall be collected.
- (7) If a computerized system is utilized it shall collect, at a minimum, the same information as required on the paper log outlined below.
- (8) If a computerized system that tracks vendor/visitor visits is not in use at the facility, the Vendor/Visitor/Temporary Sign-In Log must be utilized and include the following information:
 - (a) Date;
 - (b) Name;
 - (c) Company name;
 - (d) Vendor license number or temporary badge number;
 - (e) Reason for visit;
 - (f) Time in;
 - (g) Public Safety Officer signature & gaming license number;
 - (h) Time out; and
 - (i) Public Safety Officer signature & gaming license number.
- (9) Medical items leaving a cash/chip handling area must be inspected by Public Safety.
- (10) Among other responsibilities, Public Safety may be considered the independent department as referred to in the MICS, TICS and these regulations.
- (11) Public Safety shall establish procedures as approved by the Commission for the confiscation of counterfeits including currency, chips, ticket vouchers, or any other wagering instrument.

(12) Public Safety shall establish procedures as approved by the Commission for the use of Evidence Chain of Custody Logs.

(13) In the event of a Wide-Area Progressive jackpot, Public Safety shall secure the area around the gaming machine.

(14) A room with audio and video surveillance must be used to detain, interview or interrogate persons suspected of illegal or unlawful activities, (acts in violation of Federal, State or Tribal laws, TICS/MICS, Regulations, Compact or the Gaming Code). Surveillance must be notified to ensure adequate coverage. If a room is unavailable, a minimum of three (3) people shall be involved; at least one of these three (3) people shall be from an independent department.

16.6 House Rules.

(1) Public Safety Officers are required to know and enforce Gaming Operation House Rules.

(2) House Rules must include, but are not limited to: to include, but not limited to, the following:

- (a) All gaming patrons must be at least 21 years old to wager; proof of age may be required. A government issued photo ID must be provided upon request.
- (b) If at any time a Public Safety Officer is unsure about a patron's eligibility to wager, they should respectfully request a government issued photo ID be provided.
- (c) Bags, backpacks, purses, overcoats and other items, which may conceal prohibited items, are subject to search by Public Safety.
- (d) Patrons are only allowed access to public areas of the casino. All visitors must check in with Public Safety to receive a visitor's badge. Public Safety or other employee will escort the visitor to the designated area.

16.7 Standards for Drop and Count. Different tier levels require different regulations to be implemented and are defined in the MICS/TICS.

(1) Public Safety Officers serve an essential role in the drop procedures at the Gaming Operation. Public Safety Officers shall ensure the protection of all money and employees throughout the drop procedure. Public Safety Officers are responsible for securing the immediate work area and providing a physical presence to discourage any potential problems.

(2) Public Safety Officers shall notify Surveillance and await authorization to begin the drop process.

- (a) Public Safety Officers shall communicate the names of all employees that are performing the drop procedures.

(3) Public Safety Officers must notify Surveillance each time the Drop Team progresses to another zone. This will ensure that necessary adjustments can be made to adequately monitor the drop process.

(4) Once the drop procedure is complete, a Public Safety Officer shall communicate the conclusion of the drop to Surveillance for the completion time to be documented.

(5) Public Safety Officers shall accompany Drop and Count employees, when necessary, to ensure compliance with the MICS/TICS.

(6) Travel Plaza Drop.

- (a) During the Travel Plaza drop the following must be communicated to Surveillance:

- (i) Prior to leaving to fulfill drop duties at the Travel Plaza;
 - (ii) Upon arrival to inform of commencement of drop;
 - (iii) When drop is completed;
 - (iv) When exiting the Travel Plaza; and
 - (v) Upon arrival back to main site.
- (b) Any funds removed from the canisters during the drop process must be locked in a canister/bag. Public Safety Officers must accompany the locked canister/bag until the funds are secured in the count room.
- (c) The transport of any gaming funds to an adjacent gaming facility requires a Public Safety escort. Gaming funds must be secured inside a locked container/bag. Access to the container/bag keys during transport is prohibited.
 - (i) The container/bag must be locked and unlocked under audio/video surveillance.

16.8 Key Control and Sign Out Procedures.

- (1) Key Custodian. The Gaming Operation shall designate a minimum of two (2) Gaming Operation employees, one of which shall be the Public Safety Director, to be responsible for the inventory and maintaining of logs for all sensitive keys.
- (2) All sensitive keys are to be tagged and kept in a designated location as approved by the Commission, in a key control box, which may be controlled by the Key Custodian and must be under video surveillance.
- (3) All duplicate keys are to be inventoried and kept in a designated location as approved by the Commission, which may be controlled by the Key Custodian and must be under video surveillance.
- (4) Public Safety shall be the independent department required for sensitive keys that require dual or triple access with the exception of the CPU/Logic Key. The CPU/Logic Key is only accessible by the Commission.
- (5) Public Safety should not be the initiator of the key removal. For dual access key(s) Public Safety shall be the second person and for triple access key(s) Public Safety shall be either the second or third person.
- (6) The Key Custodian shall maintain a Key Inventory Log to document duplicate key activity. The Key Inventory Log shall include the following information:
 - (a) Key Name;
 - (b) Number of keys; and
 - (c) Signature & gaming license number of person doing inventory;
- (7) The Key Custodian shall maintain a Manual Key Control Log to document key activity. The Manual Key Log shall include the following information:
 - (a) Date;
 - (b) Time of sign out;
 - (c) Key number;
 - (d) Signature & gaming license number of all person(s) signing out the keys;
 - (e) Reason; and
 - (f) Time of key return.
- (8) The Commission or the Gaming Operation, as approved by the Commission shall establish and

the Gaming Operation shall comply with procedures regarding key destruction. The Key Destruction Log shall include the following information:

- (a) Date;
 - (b) Time;
 - (c) Key Number;
 - (d) Signature & gaming license number of all person(s) destroying keys; and
 - (e) Reason.
- (9) The Commission or the Gaming Operation, as approved by the Commission shall establish and the Gaming Operation shall comply with procedures regarding issuance of sensitive keys to department Managers or designated employees as approved by the Commission.

16.9 Reporting Missing Sensitive Keys

- (1) Any sensitive key(s) that is lost, missing or taken from the gaming facility requires immediate notification to the Manager on Duty (MOD) and the Key Custodian.
- (2) Once the sensitive key(s) is discovered lost, missing or taken from the gaming facility, the Commission must be notified (via email) by the Key Custodian within twenty-four (24) hours.
- (3) The Key Custodian must immediately notify the Commission (via email) once the key(s) has been recovered.

16.10 Logs and Reports.

- (1) The Public Safety Department shall document in a log any usual or unusual activities or events related to the Gaming Operation. Each log shall consist of the following information:
 - (a) Name and gaming license number of officer completing log;
 - (b) Date;
 - (c) Time;
 - (d) Location;
 - (e) Nature of the activity or event; and
 - (f) Identification of person(s) involved or who witnessed the activity or event.
- (2) Logs shall be made available to the Commission upon request. All logs shall be submitted to the Public Safety Supervisor/Manager and the Public Safety Director.
- (3) The Public Safety Department shall document in a report any incidents or events related to the Gaming Operation. Each report shall consist of the following information:
 - (a) Name and gaming license number of officer completing report;
 - (b) Date;
 - (c) Time;
 - (d) Location;
 - (e) Nature of the incident or event; and
 - (f) Identification of person(s) involved or who witnessed the incident or event.
- (4) Reports shall be provided to the Commission updating the progress of cases not yet closed.
- (5) Reports shall be submitted to the Commission indicating the outcome/closure of each incident, situation or occurrence that pertains to the Gaming Operation, and to allow for proper handling of any

gaming enforcement action by the Commission.

16.11 Reporting Procedure Violations.

- (1) The Public Safety Department shall document in a report any procedural violation(s) related to the Gaming Operation. Each report shall consist of the following information:
 - (a) Name and gaming license number of officer completing report;
 - (b) Date;
 - (c) Time;
 - (d) Location;
 - (e) Nature of the incident or event; and
 - (f) Identification of person(s) involved or who witnessed the procedure violation.
- (2) Procedure violation reports shall be submitted to the Commission indicating the outcome/closure or disciplinary action taken of each procedure violation that pertains to the Gaming Operation, and to allow for proper handling of any gaming enforcement action by the Commission.

16.12 Money Transfers/Draws.

- (1) Public Safety shall not have access to any money safe in the Gaming Operation.
- (2) Public Safety shall provide an escort for authorized employees transporting funds of more than \$500.00 within the Gaming Operation facility. The authorized employees shall be responsible for recording, acquiring and distributing the money transfer and/or draw.
- (3) A Public Safety Officer shall be present to witness and provide protection over the transfer or draw until verified.
- (4) The transport of any funds from a gaming facility to an adjacent facility requires a Public Safety escort. Funds must be secured inside a locked container/bag. Access to the container/bag keys during transport is prohibited. The container/bag must be locked and unlocked under audio/video surveillance.
- (5) Public Safety must notify Surveillance prior to any transfer of money.

16.13 Prohibited Person Verification.

- (1) When a prohibited person is verified as a banned patron or self-excluded patron, Public Safety must immediately notify Surveillance and promptly escort the patron off the gaming premises.
- (2) If the prohibited person is identified as a banned patron or self-excluded patron, the employee must terminate any transaction and notify Public Safety immediately.
- (3) All winnings (whether cash, property, or in any other form), credits, tokens and/or promotional items received by the prohibited person must be forfeited by the patron to the Gaming Operation.
- (4) All winnings (whether, cash, property, or in any other form), credits, tokens, or vouchers forfeited by the prohibited person must be documented by the Gaming Operation.
- (5) All promotional items forfeited by the prohibited person may be awarded to an eligible casino patron in a manner approved by the Gaming Operation.
- (6) In accordance with Section 24 of these regulations, Public Safety shall be trained to identify

persons prohibited from the gaming facility and/or gaming premises.

16.14 Department Policies and Procedures

- (1) All policies and procedures must be submitted to the Commission, at least thirty (30) days prior to intended implementation date.
- (2) Any revisions made to a department's policies and procedures (including memos and forms) must be approved by the Gaming Operation prior to the implementation of such policy.
- (3) The Gaming Operation must notify the Gaming Enterprise of any approved policy and procedure revisions.
- (4) The Gaming Operation must distribute any approved policy and procedure revisions to applicable departments.
- (5) Prior to implementing any proposed "test" phase(s), written authorization must be obtained from the Commission to ensure proposed procedures are compliant with all applicable gaming regulations.
- (6) Each proposed "test" phase must be submitted by the Gaming Operation to the Commission and shall include the following information:
 - (a) Location(s);
 - (b) Affected department(s); and
 - (c) Dates of testing (beginning/ending).

16.15 Compliance with Tribal Internal Control Standards. The Commission will ensure the Gaming Operation remains in compliance with the TICS. Failure to comply with the TICS is an unsuitable method of operation. The Commission shall provide notification to the Gaming Enterprise or Gaming Operation when a violation is occurring or has occurred and may take enforcement action in accordance with Section 3 of Chapter I of these regulations.

16.16 Final Decision. If at any time the interpretation of these regulations is in question, the decision of the Commission shall be final and non-appealable.