

Santa Clara Pueblo Gaming Commission



Cybersecurity

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CHAPTER IV – GENERAL PROVISIONS

SECTION 32: CYBERSECURITY

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CHAPTER V – GENERAL PROVISIONS

SECTION 32: CYBERSECURITY

32.1 Purpose. The purpose of these regulations is to require for the Commission to adopt and enforce procedures for cybersecurity to ensure the protection of gaming data and information stored on the gaming premises for the conduct of Class III Gaming that are in compliance with the Tribal/State Compact approved on October 23, 2015.

32.2 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. The Commission has the responsibility under the Gaming Code to enforce all policies and procedures for cybersecurity for the protection of gaming data and information stored at the gaming facility. The Commission also has the authority to issue regulations, not inconsistent with the Gaming Code, the Compact, and IGRA, to govern the operation and management of each gaming operation and gaming facility. The Commission shall work with each gaming enterprise or management contractor to establish policies and procedures for cybersecurity applicable to the gaming operation and/or occurring on the gaming premises.

32.3 Cybersecurity Awareness.

- (1) All employees shall receive guidance from the gaming enterprise in the recognition of threats to cybersecurity and the actions necessary to report these threats or incidents. Guidance shall be included in department policies, new hire orientation, and information distributed by the Information Technology Department.
- (2) The gaming operation shall submit a copy of its procedures established pursuant to the requirements of this Section to the Commission. Any amendments to said procedures shall be submitted to the Commission prior to their implementation.
- (3) When a threat to cybersecurity is suspected on the gaming premises, employees will report it to the Information Technology Department immediately.
- (4) The gaming operation shall provide appropriate telephone number and information on how to alert the Information Technology Department.
- (5) As approved by the Commission, the gaming operation shall establish a cybersecurity awareness training program and identify a person to be responsible for training, or coordination of training to ensure that regulatory requirements of this section are implemented, administered, and monitored to maintain compliance.
- (6) The cybersecurity awareness training program established by the gaming operation shall include training manuals and other materials necessary to educate employees about recognizing phishing, malware, ransomware, other cyber breaches and to be familiar with Computer Security Incident Response policies.

- (a) The program should include specific, detailed procedures to detect or prevent a breach of cybersecurity and policy concerning carrying out the security measures taken in a given circumstance where a breach in cybersecurity is identified or suspected;
 - (i) The gaming operation shall provide training on how to recognize external and internal breach of cybersecurity; and
 - (ii) Printed materials to educate employees about cybersecurity shall be conspicuously displayed and available to gaming employees. The materials may include signs and posters located inside the gaming operation premises, brochures discussing recognizing threats to cybersecurity and reporting such suspected incidents.
- (b) The following persons shall be required to complete cybersecurity awareness training:
 - (i) All gaming employees whose primary responsibilities require that they be present on the gaming floor;
 - (ii) All gaming employees whose primary duties require that they perform their job functions on the gaming floor;
 - (iii) Gaming employees working in information technology; and
 - (iv) Any other person(s) that the gaming operation may designate shall attend training sessions.
- (c) A record of all persons having successfully completed the required cybersecurity awareness training shall be maintained by the person designated by the gaming operation as the trainer or coordinator of training and a copy of that record shall be supplied to the Human Resources Department, and to the Commission, upon request.
- (d) Cybersecurity awareness training shall be completed:
 - (i) Within ninety (90) days of date of hire or promotion; and
 - (ii) Not less than annually thereafter for refresher training.

32.4 General.

- (1) The gaming enterprise shall develop a response plan that will include data recovery, strengthening security systems, reporting to the Commission in a final report of the circumstances of the breach, and shall prepare statements on behalf of the gaming enterprise.
- (2) The gaming enterprise will purchase and maintain a cybersecurity liability insurance policy that will provide, at a minimum, coverage of one million dollars (\$1,000,000) per incident and two million dollars (\$2,000,000) aggregate per policy year.
- (3) The gaming enterprise will complete vulnerability assessment testing of the gaming operation's IT system. The vulnerability testing shall consist of two types of tests: external and internal. The external test shall provide an overview of security vulnerabilities, which are visible from outside the gaming system network. This scan shall take into account all security layers on the network between the scanner machine and the target system. The internal network test shall provide an overview of vulnerabilities, which are visible from the local network, taking into account host-based security controls on the target system.

32.5 Employee Training. Each gaming enterprise shall see that all of its applicable employees are fully trained in the requirements of these regulations pertaining to cybersecurity awareness applicable to the gaming operation and/or occurring on the gaming premises. Such training shall be updated regularly by the gaming enterprise.

32.6 Role of the Commission. The Commission shall ensure the gaming enterprise has procedures established to administer, monitor and ensure compliance with this regulation.