

**Colorado Limited Gaming Control Commission**  
***Internal Control Minimum Procedures (ICMP)***

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**SECTION 16**

**ELECTRONIC PROMOTIONAL CREDIT SYSTEMS (EPCS)**

**A. GENERAL**

Refer to Rule 30 in the Colorado Limited Gaming Regulations for regulations related to electronic promotional credit systems.

Electronic Promotional Credit System (EPCS) means a system of components, hardware, software, and communication technology that securely transmits credits to and from a slot machine or EBT in the form of electronic promotional credits. EPCS are any systems that maintain electronic promotional credits. EPCS allows patrons to play slot machines or EBTs using a player card with a magnetic strip to download credits to a slot machine. EPCS gaming transactions at the slot machine or EBT are entirely electronic.

EPCS requires the use of an approved gaming system to affect the electronic transfer of promotional credits directly to or from a slot machine or EBT. Licensees that want to offer EPCS must receive written approval from the Division. Please see the Gaming Systems Testing section in the ICMP for notification and testing requirements. Additionally, system requirements such as system access, contingency plans, backups and recovery, etc., are in the Gaming Systems section of the ICMP.

All slot machines or EBTs enabled with electronic promotional credit functionality must be readily identifiable by patrons.

Electronic promotional credits transferred to the slot machine or EBT must be recognized as electronic drop (or E-Drop) by the licensee and reported as such on the gaming tax return.

**Electronic Promotional Credits Restrictions**

There are two types of electronic promotional transactions; cashable electronic promotional (CEP) credits, redeemable for cash, and non-cashable electronic promotional (NCEP) credits, which are not redeemable for cash and must be played in a slot machine. Credits must download to a slot machine or EBT in increments of at least \$1.00 or the denomination of the game.

No winning wager from a slot machine or EBT, including a winning wager made with NCEP credits, shall be paid with NCEP credits.

Licensees must provide notice to the patron of any restrictions specific to NCEP credits.

The system's electronic credit meters, which are separate CEP and NCEP meters, are independent of patron electronic credit transaction information.

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### **Electronic Promotional Credit Transfers**

Patrons must access promotional offers at the slot machine or EBT through use of the player's card. The patron must insert his/her player's card, enter his/her PIN into the slot machine or EBT key pad, and select the desired amount to be transferred to the gaming slot machine or EBT credit meter.

The incremental amounts transferred must be at least \$1.00 or the game denomination.

Upon transfer of electronic credits to a slot machine, the slot machine is activated for patron play and functions identically to a slot machine in standard credit play mode.

### **System Application Controls**

The licensee must have adequate application controls in place to ensure the accuracy of data input, integrity of system processing, and validity of system output. These controls must include both the operational and accounting/reporting aspects of EPCS and must consider the controls described herein. Only licensed employees are allowed access to the EPCS.

### **Written Procedures**

Written procedures must be in place to ensure EPCS activity is appropriate, and assist in both internal and external (Division of Gaming, local police, etc.) investigations regarding patron disputes.

### **Setting-Up Promotions**

All promotions and changes to the parameters of a promotion must be entered into the EPCS by a licensed employee.

### **Establishing a PIN**

Only licensed employees are allowed to set up a patron in the patron database used by EPCS. The licensee must require the patron to independently and confidentially create a secure PIN a minimum of two times; the numbers must successfully match each time entered. Licensees must have procedures in place to prevent fraudulent activity in the EPCS.

### **Resetting and/or Changing a Patron PIN:**

A patron's PIN may only be changed when the patron is present at the point of the PIN change, (e.g., if the PIN is changed at the Cage, the patron must be present at the Cage at the time of the PIN change). A patron requesting a PIN change must provide official identification verifying his/her identity at the time of the PIN change.

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**Accounting's Review of Electronic Drop**

See the Accounting section in the ICMP for additional information.

**B. TESTING REQUIREMENTS FOR EPCS**

Please see the Gaming Systems Testing ICMP section for testing notification and requirements.