

**ICMP Compliance Checklist: Section 16, Electronic Promotional Credit Systems (EPCS)
For Use by Division of Gaming and Independent Compliance Officers (ICOs)**

Legend:
C = In Compliance **N** = Noncompliance **2C** = In Compliance at Follow-up **2N** = Noncompliance at Follow-up

Licensee Name	Review Recap					
Prepared By						
Period Reviewed (ICO Use Only)				Initial Review	Follow-up	
Date & Time Completed				(1) Total items tested		
Date Follow-up Performed				(2) Total noncompliance items		

DIVISION OF GAMING USE ONLY	
Employee Signature & License #	
Casino Manager Signature & License #	

ICMP – ELECTRONIC PROMOTIONAL CREDIT SYSTEMS (EPCS) – A. GENERAL

- EPCS require 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. Have the above requirements been followed?
- All slot machines or EBTs enabled with electronic promotional credit functionality must be readily identifiable by patrons. Are all slot machines with EPCS easily identified 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. Is the electronic drop properly reported on the tax return?

C	N	2C	2N
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C	N	2C	2N
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C	N	2C	2N
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ELECTRONIC PROMOTIONAL CREDITS RESTRICTIONS

- In the event that a slot machine can offer both CEP and NCEP credits available for patron play, all NCEP credits must be wagered before any CEP credits may be wagered. CEP credits can be cashed out at any time. Has the EPCS been set up accordingly?
- Credits must download to a slot machine or EBT in increments of at least \$1.00 or the denomination of the game. Has the EPCS been set up accordingly?
- No winning wager from a slot machine or EBT, including a winning wager made with NCEP credits, shall be paid with NCEP credits. Has the EPCS been set up accordingly?
- Licensees must provide notice to the patron of any restrictions specific to NCEP credits. Has the licensee provided notice to all patrons?

C	N	2C	2N
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C	N	2C	2N
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C	N	2C	2N
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ELECTRONIC PROMOTIONAL CREDIT TRANSFERS

1. 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. Does the EPCS allow this functionality?

C	N	2C	2N
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2. The incremental amounts transferred must be at least \$1.00 or the game denomination. Does the EPCS allow this functionality?

C	N	2C	2N
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3. 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. Does the EPCS allow this functionality?

C	N	2C	2N
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SYSTEM APPLICATION CONTROLS

1. 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. Are all employees that access the EPCS licensed? Does the licensee have adequate operational and accounting controls in place? What are those controls? Document a summary of those controls.

C	N	2C	2N
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WRITTEN PROCEDURES

1. 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. Does the licensee have written procedures to protect the patron's personal information? Review the procedures and ensure the written procedures are adequate.

C	N	2C	2N
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SETTING-UP PROMOTIONS

1. All promotions and changes to the parameters of a promotion must be entered into the EPCS by a licensed employee. Ensure the most recent promotion and changes were entered into the system by a licensed employee.

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ESTABLISHING A PIN

1. 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. Review who has been entering patrons into the EPCS database and ensure they are licensed. Ensure PIN procedures meet the requirements, and ensure the procedures are effective to prevent fraudulent activity. Does the licensee have procedures in place to

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ensure fraudulent activity cannot occur? Are reviews of all activity performed? Review an adequate sample of audit trail reports to determine appropriate activity.

RESETTING AND/OR CHANGING A 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. Review the procedures for changing a patron's PIN and ensure they are adequate. Ensure patrons are providing identification to verify their identity prior to changing the PIN.

C	N	2C	2N
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Additional Comments:

Review Recap		
	<i>Initial Review</i>	<i>Follow-up</i>
(1) Total items tested	_____	_____
(2) Total noncompliance items	_____	_____