

**ICMP Compliance Checklist: Section 10, KEY CONTROL**  
**For Use by Division of Gaming and Independent Compliance Officers (ICOs)**

<b>Legend:</b>			
<b>C</b> = In Compliance	<b>N</b> = Noncompliance	<b>2C</b> = In Compliance at Follow-up	<b>2N</b> = Noncompliance at Follow-up

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

<b>DIVISION OF GAMING USE ONLY</b>			
<b>Employee Signature &amp; License #</b>			
<b>Casino Manager Signature &amp; License #</b>			

**ICMP - KEY CONTROL – A. GENERAL**

1. Keys to restricted areas are kept in two-keyed locked boxes securely attached in the cashier cage and clearly visible by surveillance. Verify the location of the restricted boxes. The cashier is responsible for ensuring that only authorized employees are allowed to check out restricted keys. Interview cashier and determine their understanding of the procedure.

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2. The cashier is also responsible to ensure restricted keys are returned in a timely manner and that all keys are properly accounted for at the end of the shift. The cashier performs a review of the key logs at the end of each shift to ensure that all restricted keys accessed throughout the shift, which are not currently in use (e.g., by the drop or count teams, slot machine repair, BV repair, etc.) have been returned to the appropriate locked boxes. In the event the keys have not been returned, the cashier is to notify the gaming manager. Review keys logs to determine compliance with this procedure. Interview cashier and determine their understanding of this procedure.

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3. Unless otherwise indicated in the ICMP, all restricted keys must be immediately returned to their applicable restricted key box(es) once the licensee has completed the task for which the keys were checked out. Observe procedures and interview casino personnel who have access to restricted keys to determine their understanding of this procedure.

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4. Restricted gaming keys are not allowed off the premises; however, the slot door and kiosk door keys may be carried anywhere, with the exception of an off-site storage facility, on the premises in conjunction with the individual's regular responsibilities while on duty. Slot tech keys (including the slot door key) may be taken to a sister casino if the casinos are connected by a doorway or pass-through. These keys are NOT allowed to be taken off premises when the individual is not on duty. If slot tech keys need to be taken to an off-site storage facility, the licensee must send an email notification to [DOR\\_CCBHCasinos@state.co.us](mailto:DOR_CCBHCasinos@state.co.us) or [DOR\\_CrippleCreekCasinos@state.co.us](mailto:DOR_CrippleCreekCasinos@state.co.us), as applicable, including a detailed summary of what keys were taken offsite, the names of the three

C	N	2C	2N
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licensed individuals (one of whom is from Security) who accompanied the keys and how long the keys were off-site. The email notification must be received within 24 hours of the keys being taken off premises. If it is suspected there was unauthorized use of a restricted key, suspicion of criminal activity in regard to a restricted key, or if a restricted key is missing, the Division must be immediately notified. Additionally, the key control log must indicate any such activity. Observe procedures and interview casino personnel who have access to restricted keys to determine their understanding of this procedure.

5. Locks requiring the use of restricted keys must be keyed differently in order to maintain an adequate control environment.

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- a. Verify the key used to access the slot machine door is not keyed the same as the key used to access the drop door.
- b. Verify the key used to release the slot machine bill validator (BV) is not keyed the same as the key used to release the kiosk stacker.
- c. Verify the key used to access the contents of the slot machine bill validator (BV Content Key) is not keyed the same as the key used to access the contents of the kiosk stacker (Kiosk Stacker Content Key).

6. Restricted and non-restricted keys may not be keyed the same. For example, the BV Release key may not be keyed the same as the Belly Glass Door Key. Also, one person may not have the BV Release Key and the BV Content Key at the same time. Interview cashier and determine their understanding of these requirements.

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7. Non-restricted gaming keys may not be kept in the security (box 1) or gaming manager (box 2) locked boxes. It is recommended that general (non-restricted) gaming keys be maintained in a separate locked box #3 (box 3). Two locks are not required on box 3 but there must be procedures in place to ensure the accountability of the keys maintained in the non-restricted key box. Verify non-restricted keys are not located in the restricted key boxes.

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8. Between shifts, restricted and non-restricted keys may be transferred to the individual responsible for the keys during the following shift by having that individual sign the key log. The cashier does not need to initial the log or physically transfer the key(s) to the following shift individual. Observe or interview casino personnel and determine their understanding of this procedure.

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9. Restricted keys must be inventoried at least twice a year. This includes **all** locked boxes containing restricted keys. This may be accomplished in conjunction with the completion of the compliance checklists by the internal compliance officer. Evidence of the inventory must be documented and must include the information outlined in the ICMP. Verify the inventories were conducted and the documentation includes the required information.

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10. One person may not have access to more than one key box. For example, if one employee is considered the gaming manager and is also acting as security, this person may not have

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both the gaming manager’s key and security’s key which are used to access boxes 1 and 2. The gaming manager’s key and security’s key used to access boxes 1 and 2 must be maintained by two different licensed individuals. Verify that casino personnel, who have access to keys to box 1 and 2, do not have both keys; also interview these individuals to determine their understanding of this requirement.

11. No keys are to remain inserted into the locks of boxes that provide access to restricted keys. The cashier, gaming manager, and security must maintain control over their key at all times. Verify no keys are left in the locks.

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12. Locked boxes utilized for an Automated Key Tracking System (AKTS) must be securely attached to an area clearly visible by surveillance. Verify the location of the AKTS box meets this requirement. Boxes 1 and 2 are securely attached to an area clearly visible by surveillance in the cashier cage. Access to keys or areas accessed through the use of restricted keys is limited to only authorized individuals. Key authorization is granted through the use of key authorization logs or signature cards for a manual key control environment and utilization of AKTS. The AKTS must be accurately reflect the authorization reflected on the log or signature cards.

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**ICMP - KEY CONTROL – B. KEY CONTROL ENVIRONMENT**

1. The following restricted keys are maintained in locked box 1 (security box). List the key number associated with each restricted key. Verify only the allowable restricted keys are maintained in this box.

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KEY	KEY NUMBER	KEY	KEY NUMBER
Table drop box rack key		Kiosk cassette release key	
Table drop box and EBT release key(s)		Kiosk stacker rack key	
Table multi-shift drop box shift change key		Handheld validation unit (floor & table) cabinet key	
Card cabinet key		Count room key	
Dice cabinet key (primary & secondary storage)		Vault key (owner/operator/designee)	
Slot machine drop key		Calibration module key	
Bill validator rack key		Duplicate key locked box (security)	
Bill validator release key		Duplicate key to the two keyed drop key box (security)	
Emergency BV drop cabinet key		BV release two keyed locked box (security)	

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Kiosk stacker release key		Unused excess chips and tokens (security)	
Kiosk door key (security)			

2. One access key to locked box 1 is kept in the cashier cage and the other key is maintained by security. Both keys are required to open the locked box. Verify the location of the keys.

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3. The following restricted keys are maintained in locked box 2 (gaming manager box). List the key number associated with each restricted key. Verify only the allowable restricted keys are maintained in this box.

C	N	2C	2N
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KEY	KEY NUMBER	KEY	KEY NUMBER
Table drop box and EBT content key(s)		Vault key (gaming manager)	
EBT door key		Calibration module key	
Slot machine door key (may also have meter keys on ring)		Duplicate key locked box (gaming manager)	
Bill validator content key		Duplicate key to the two keyed drop key box (gaming manager)	
Kiosk stacker content key		Duplicate of slot tech key to BV release two keyed locked box	
Kiosk door key (gaming manager)		W-2G reset key	
Locked dispensing machine key (whiz box)		Unused excess chips and tokens (gaming manager)	

4. One access key to locked box 2 is kept in the cashier cage and the gaming manager maintains the other key. Both keys are required to open the locked box. Verify the location of the keys.

C	N	2C	2N
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5. The slot tech key rings containing the slot door keys, meter reset keys, and other non-restricted keys, can be maintained in a separate dual locked box (e.g., slot tech locked box) in addition to box 2. This separate box must be under surveillance and may be located in the slot supervisor's office, gaming manager's office, surveillance room, security office or similar secure area. Access to the box is restricted to the slot techs and gaming manager. Both individuals maintain control of their respective key and both must be present to access the box. Keys from the box are checked out and checked in on the key access log located near the box. The log is forwarded to accounting once a page is completed. Observe or interview slot and management personnel and determine their understanding of this procedure.

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|--|--|----|----|----|----|
| <p>6. Verify two slot key rings contain only keys allowed to be on these rings (i.e. no other restricted key other than slot door keys). Document the keys on the rings.</p>   | <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 25%; text-align: center;">C</td> <td style="width: 25%; text-align: center;">N</td> <td style="width: 25%; text-align: center;">2C</td> <td style="width: 25%; text-align: center;">2N</td> </tr> </table> | C  | N  | 2C | 2N |
| C  | N  | 2C | 2N |    |    |
| <p>7. The licensee may have someone from security check out the BV Release Key to slot machines and EBT's for the entire shift. Two licensed individuals, one of which must be security, must be present when the BV Release Key is used. Observe or interview security personnel and determine their understanding of this procedure.</p>   | <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 25%; text-align: center;">C</td> <td style="width: 25%; text-align: center;">N</td> <td style="width: 25%; text-align: center;">2C</td> <td style="width: 25%; text-align: center;">2N</td> </tr> </table> | C  | N  | 2C | 2N |
| C  | N  | 2C | 2N |    |    |
| <p>8. Access to the kiosk stacker requires a minimum of two individuals. If the kiosk requires two door keys, one key must be maintained in box 1 and the other in box 2. The door keys may be checked out for the entire shift by two separate individuals. Both individuals must be present when the kiosk is accessed. The Kiosk Stacker Release Key may be checked out for the entire shift by one of the individuals maintaining one of the door keys. If the kiosk requires one door key (maintained in box 2) and one Kiosk Stacker Release Key (maintained in box 1), these keys may be checked out for the entire shift by two separate individuals. At no time may just one individual access the kiosk funds. Observe or interview casino personnel to determine their understanding of these procedures.</p> | <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 25%; text-align: center;">C</td> <td style="width: 25%; text-align: center;">N</td> <td style="width: 25%; text-align: center;">2C</td> <td style="width: 25%; text-align: center;">2N</td> </tr> </table> | C  | N  | 2C | 2N |
| C  | N  | 2C | 2N |    |    |
| <p>9. The Count Room Key must be immediately checked in once the licensee has completed the task for which the key was originally checked out. When accessing the count room for purposes other than drop and count, it is not required for a second person to escort the person receiving the key, provided there are no unsecured funds in the count room. Observe or interview casino personnel to determine their understanding of this procedure.</p>   | <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 25%; text-align: center;">C</td> <td style="width: 25%; text-align: center;">N</td> <td style="width: 25%; text-align: center;">2C</td> <td style="width: 25%; text-align: center;">2N</td> </tr> </table> | C  | N  | 2C | 2N |
| C  | N  | 2C | 2N |    |    |
| <p>10. Access to the vault requires dual access (i.e., two individuals, each with a unique key or lock combination). One key or lock combination is kept in the possession of the owner/operator (or their designee) and the other in the possession of the gaming manager. Alternatively, the two keys to the vault may be kept in the two-keyed locked boxes, one key in box 1 and the second key in box 2. Observe or interview casino personnel to determine their understanding of this procedure.</p>  | <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 25%; text-align: center;">C</td> <td style="width: 25%; text-align: center;">N</td> <td style="width: 25%; text-align: center;">2C</td> <td style="width: 25%; text-align: center;">2N</td> </tr> </table> | C  | N  | 2C | 2N |
| C  | N  | 2C | 2N |    |    |
| <p>11. If the licensee elects to secure the weigh scale with a lock and key, the key is maintained by the manufacturer or manufacturer's representative. Alternatively, the key may be maintained in either box 1 or box 2, with only the manufacturer or manufacturer's representative having authority to obtain the key. The manufacturer or manufacturer's representative must sign the key access log when checking the key out. Observe or interview casino personnel to determine their understanding of this procedure.</p>  | <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 25%; text-align: center;">C</td> <td style="width: 25%; text-align: center;">N</td> <td style="width: 25%; text-align: center;">2C</td> <td style="width: 25%; text-align: center;">2N</td> </tr> </table> | C  | N  | 2C | 2N |
| C  | N  | 2C | 2N |    |    |
| <p>12. Dual locks are required for the duplicate key box. If the licensee does not have a vault, the duplicate keys must be stored in a two-keyed locked box in the accounting office, in the security office, or in another secure area limiting access to authorized personnel only. One key to the locked box for the duplicate keys is maintained in box 1. The second key to the duplicate key box is maintained in box 2. The duplicate key box must be in a secure location and must be under surveillance coverage. Verify the location of the duplicate key</p>   | <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 25%; text-align: center;">C</td> <td style="width: 25%; text-align: center;">N</td> <td style="width: 25%; text-align: center;">2C</td> <td style="width: 25%; text-align: center;">2N</td> </tr> </table> | C  | N  | 2C | 2N |
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box and determine compliance with these requirements.

13. The licensee may establish a Drop Key Box, which is a two-keyed locked box. The Drop Key Box must be under surveillance and must be secured to prevent unauthorized access. The objective is to preclude access to the Drop Key Box by one individual. Two separate licensed individuals must each maintain one key to the Drop Key Box. The drop/count team leader maintains one key to this box. A duplicate of the drop/count team leader's key is maintained in box 2 in case any drop keys need to be checked out and the drop/count team leader is not present. The second key to access this box is maintained in box 1 or by another drop team member. If the (security) key to the Drop Key Box is not maintained by another drop team member, it must be checked out from the cage or AKTS. It must take two licensed individuals to access the Drop Key Box and a key log must be maintained to document key check out and key check in. The key log is forwarded to accounting once a page is complete. For any break taken either prior to or during the drop and count, all keys should be checked back into the Drop Key Box. At the conclusion of the break, all keys should be checked out again pursuant to standard key check out procedures. Alternatively, the keys may be maintained by at least three count team members who are required to stay together and are under surveillance at all times. The drop/count team(s) may only obtain the keys necessary to perform their respective function, and the keys must be returned to the Drop Key box immediately upon completion of that function. (Additional keys that may be maintained in the Drop Key box: (1) slot machine door key, if it is necessary to access the BV stacker; (2) key to storage of test money maintained in the count room; (3) keys needed to drop/count kiosks; and (4) keys needed to count table games). Verify only the keys per the ICMP are maintained in the Drop Key Box.

C	N	2C	2N
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14. The licensee may establish a BV Release Key Box, which is a two-keyed locked box. The slot tech maintains one key to this box and security maintains the other key. A duplicate of the slot tech's key is maintained in box 2. Security's key is maintained in box 1. The controls and procedures for checking out the BV Release Key are the same as for checking out any restricted key. It takes two licensed people to access the box and a key log must be maintained to document key check out and key check in. The BV Release Key is checked in and out of the key box as repairs are needed. The BV Release Key Box must be under surveillance and must be secured to prevent unauthorized access. Verify the location of the box meets this requirement. Interview slot personnel and determine their understanding of this requirement.

C	N	2C	2N
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15. Some slot machines allow patrons to have won credits greater than the hopper lock out amount to continue playing these credits once the slot attendant resets the game. If a jackpot of \$1,200 or more occurs on one of these slot machines, a W-2G must be completed. To reset the game and allow the patron to continue playing these credits, the attendant uses a second reset key switch (which is in the same proximity as the jackpot reset key switch). The casino must replace the lock shipped with the machine with a casino specific lock and key before these games can be played. This key, called a W-2G reset key, is considered a restricted key and must be stored in box 2.

C	N	2C	2N
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16. If unused and excess chips and tokens are stored in a dual locked area, one key is maintained in box 1 and one key is maintained in box 2.

C	N	2C	2N
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17. Each table’s progressive controller box must be housed such that access to the controller requires dual access, which may not necessarily be accomplished through the use of two keys.

C	N	2C	2N
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**OTHER KEY CONTROL PROCEDURES**

1. The Slot Machine Door Key, EBT Door Key, BV Release Key Box Key, EBT BV Release Key, TG BV Release Key, BV Release Key (see requirements noted above), Kiosk Door Key, Kiosk Stacker Key, and Handheld Validation Unit Cabinet Key may be checked out at the beginning of each shift for the entire shift. In between shifts, the keys may be transferred to the authorized individual responsible on the following shift by having that individual sign the key log. The cashier does not need to initial the log or physically transfer the key. Licensees utilizing an AKTS may not transfer keys between individuals. Keys must be returned to and checked out of, the AKTS. Interview casino personnel to determine their understanding of these procedures.

C	N	2C	2N
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2. All BV boxes must have a lock to restrict access to the box contents. This lock must be keyed differently than the BV Release Key, as well as the Slot Machine and EBT Door Key. Verify the locks are keyed differently.

C	N	2C	2N
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3. All table game drop boxes must also have a lock to restrict access to the box contents, which must be keyed differently than the key to release the box or EBT BV from the table. Verify the locks are keyed differently.

C	N	2C	2N
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4. If slot count and table games count are performed in separate rooms, each room must be keyed differently so that slot count team members may not gain unauthorized access to the table games count room and vice versa. Verify the locks are keyed differently. Interview count personnel and determine their understanding of this requirement.

C	N	2C	2N
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5. Broken keys, or keys for locks that have been changed, may be destroyed and discarded at the licensee’s discretion, or given to a locksmith to destroy. If a duplicate key is issued in place of a broken key, the duplicate key control log must indicate this as the reason for removal of the key from the duplicate key locked box. Interview personnel responsible for key destruction and replacement to determine their understanding of these procedures.

C	N	2C	2N
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**ICMP – KEY CONTROL -- C. KEY CONTROL LOGS**

1. Regardless of whether a manual or an AKTS environment is in place, access to all restricted keys must be documented. Key control logs must be located near the associated key box. The entire transaction of checking keys out/in and recording of such is captured by a single surveillance camera. Observe the process and determine compliance with this procedure.

C	N	2C	2N
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2. In a manual environment, key logs are used to document key access. A key control log is kept for each locked box and is completed every time a key is checked out or in. The key logs, with exception of the Duplicate Key Control Log, are forwarded to accounting for review once a page is complete, but at least monthly. The Duplicate Key Control Log should be forwarded to accounting once a page is completed but at least annually. Key logs must include the following information:

C	N	2C	2N
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- a. Date of issuance.
- b. Time of issuance
- c. Signature and gaming license number of the individual receiving the key (the person receiving is the person who will be using the key to complete a procedure).
- d. Key number.
- e. Reason for removal of key (e.g., perform table games drop, perform slot drop, etc.). The description must be detailed so a reviewer can determine what the key was used for.
- f. Initials of cashier issuing key (if manual system is used).
- g. Initials of gaming manager or security employee witnessing issuance of key.
- h. Date of return.
- i. Time of return.
- j. Initials of individual accepting the return of key (i.e., cashier) if manual system is used.

Review the key logs and determine all the required information is included.

3. When a key is requested in a manual environment:

a. The employee requests a key from the cashier. The cashier verifies that the person requesting the key has authority. If the person does not have authority the cashier denies access. Randomly select at least five entries on each key log (e.g., security and gaming manager logs) and compare to the authorization logs.

C	N	2C	2N
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b. If the employee has the authority, the key log is completed, noting the time and date out and the reason for removal (e.g., table games drop, slot count, etc.). The cashier records the key number, initials the log, gives the key to the authorized person, and the key log is signed by the employee taking responsibility for the key. The person signing the key control log is the person ultimately receiving the key (e.g., drop/count team leader). Observe the manual key check out process and determine compliance with this procedure.

C	N	2C	2N
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c. When restricted keys are signed out, the gaming manager or security employee who authorizes the key check-out by providing the cashier with their locked box key also initials the log. The gaming manager or security employee must be present and observe the key check-out and key check-in processes. Observe the key check out process and determine compliance with this procedure.

C	N	2C	2N
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d. When the key is returned, the cashier accepts custody and responsibility for the key by recording the time, date in, and initialing the key control log.

C	N	2C	2N
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e. The cashier immediately places the key back into the key box, locks the box, and removes the access keys. Observe the key check in process and determine compliance with this procedure.

C	N	2C	2N
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**ICMP – KEY CONTROL -- D. TABLE GAMES AND PIT PODIUM KEY CONTROL**

1. The Table Drop Box Release Keys maintained in box 1 may be keyed the same for Blackjack, Poker, Craps and Roulette. The Table Drop Box Content Keys maintained in box 2 may be keyed the same for Blackjack, Poker, Craps and Roulette. However, the Table Drop Key Box Release Keys must be keyed differently than the Table Drop Box Content Keys. EBTs have individual main door access locks similar to slot machines. Follow the slot machine requirement for key control. Determine compliance with this requirement.

C	N	2C	2N
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2. The Table Drop Box Release Key used to drop either the drop box or the poker jackpot award drop box can be the same key. The key to access the contents of either the table drop box or the poker jackpot award drop box can be the same key. However, the Table Drop Box Release Key for the drop box and poker jackpot award drop box must be keyed differently than the Table Drop Box Content Key. Determine compliance with this requirement.

C	N	2C	2N
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3. The keys to the pit podium and table trays may be, but are not required to be, kept in box 1 or box 2. Access to the pit podium and table tray keys is limited to the pit supervisor, table games manager or gaming manager. If a pit podium bank is utilized, it must be keyed separately. Access to the pit podium bank is limited to the employee responsible for maintaining control over the assigned bank. Determine compliance with these requirements.

C	N	2C	2N
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4. The Card Cabinet Key may be the same as the Dice Cabinet Key (primary and secondary storage) as long as adequate inventory controls are established for cards and dice. Primary storage must be established by the licensee for extra dice. This area shall have two separate locks with one key maintained in box 1 (security) and the second key maintained by the table games manager or pit supervisor. A secondary dice storage area is optional and the two locks may be keyed the same as the two locks on the primary storage area. Determine compliance with these requirements.

C	N	2C	2N
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**ICMP – KEY CONTROL – E. AUTOMATED KEY TRACKING SYSTEM (AKTS) SYSTEM ADMINISTRATION**

1. The system administrator(s) must be **KEY** licensed employees. This person(s) shall appropriately configure the AKTS to ensure proper authorization and access to restricted

C	N	2C	2N
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keys. Determine compliance with this requirement. Document the names and key license numbers of all system administrators:

2. The AKTS access permissions must be configured in order to distinguish a key licensed employee performing in the capacity of the system administrator from the same individual accessing the system to perform their normal job functions (e.g., gaming manager). Interview the AKTS administrator(s) and verify compliance with this requirement.

C	N	2C	2N
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3. Key authorization logs or signature cards must be maintained for an AKTS. The system permissions must accurately reflect the authorization reflected on the log or signature cards. In the setup of the AKTS, no access shall be granted that would allow any one individual sole access to restricted keys with ② in the key inventory diagram shown in the ICMP. Review the logs/cards and verify they contain all the required information. Access to the keys must be controlled through appropriate access permissions. This may include, but is not limited to, the use of passwords that provide access to the keys. Review a sample of employees and determine if the permissions granted in AKTS agrees with the logs/cards.

C	N	2C	2N
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4. To preclude unauthorized access, system access for terminated (voluntary or involuntary) users must be removed from the system as soon as possible but no later than 72 hours after the effective termination date. Review a sample of employees and determine if their access was removed from the system in a timely manner.

C	N	2C	2N
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5. Any time the system administrator allows access to the AKTS locked boxes to perform maintenance, cleaning of the keys or any other purposes, the person accessing the keys must be accompanied by security personnel during the entire time of access. This access must be documented with the name of the individual accessing the keys, security personnel name and license number observing the access, the date and time of access and the reason for access. Interview the system administrator and determine their understanding of this procedure. Review the documentation and determine if it contains all the required information.

C	N	2C	2N
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**SYSTEM OPERATION**

1. At the end of each gaming day the gaming manager or security personnel must generate AKTS reports documenting any restricted keys currently not stored in the AKTS. A review of the reports must be performed to ensure all restricted keys accessed throughout the gaming day which are not currently in use (e.g., by the drop or count teams, slot repair, on-duty employees, etc.) have been returned to the AKTS. Evidence of this review is forwarded to accounting after the review is complete. Interview personnel responsible for reviewing the reports and determine their understanding of the procedure. Review the reports and determine if there is adequate documentation.

C	N	2C	2N
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2. If any keys have not been returned, an investigation must be immediately initiated. The investigation must be documented and include, at a minimum, the key description, last person accessing the key, investigation performed and by whom, and the results of the

C	N	2C	2N
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**ICMP Compliance Checklist: Section 10, KEY CONTROL**  
**For Use by Division of Gaming and Independent Compliance Officers (ICOs)**

**Legend:**

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investigation. This documentation is immediately forwarded to accounting. Interview personnel responsible for reviewing the reports and determine their understanding of the procedure. Review the reports and determine if there is adequate documentation.

**SYSTEM ACCOUNTABILITY**

1. The AKTS must be monitored and reviewed by personnel who are independent of the AKTS administrator functions. The licensee must maintain a list, which includes the name, license number and title of each AKTS administrator. Determine compliance with these requirements.

C	N	2C	2N
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2. Accounting personnel must perform a review of reports generated by the AKTS that document key transactions. This review is performed on a timely basis (as defined in the written accounting plan) to ensure all restricted keys are returned within a reasonable amount of time pursuant to the completion of the task that created the need for the key(s) removal and to ascertain if any unusual key removals or key returns have occurred. Timely investigations must be performed for any missing restricted keys, improper transactions, and/or unusual occurrences. The report(s) review must be evidenced by the reviewer's signature and date of review. Determine compliance with these requirements.

C	N	2C	2N
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3. Accounting perform a review of reports generated by the AKTS that document transactions performed by system administrators. This review is performed on a timely basis (as defined in the written accounting plan) to determine whether the transactions completed by system administrators provide adequate control over access to restricted gaming keys. This review is to determine whether the system administrator's transactions were proper, reasonable, and authorized. Any time persons are added to or removed from the system, accounting personnel compare the key authorization logs or signature cards to the system information to ensure that key access within the system is appropriate. Any time inappropriate access is discovered or suspected, surveillance coverage of the AKTS and any related areas must be reviewed. The surveillance coverage must be maintained until such time there is a resolution to the investigation. Accounting's review is evidenced by the reviewer's signature and date of review. Determine compliance with these requirements.

C	N	2C	2N
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**AKTS FAILURE**

1. The licensee must have procedures in place that adequately address key control in the case of an emergency or an AKTS failure. These procedures must ensure access to restricted keys requires the physical involvement of the gaming manager and security personnel. The key control logs used in a manual environment are used in this situation. Interview management personnel and determine their understanding of the procedure.

C	N	2C	2N
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2. If at any time the emergency release access is utilized, the gaming manager and security personnel must be present to access the keys. Each occurrence must be documented and the Division must be notified immediately in writing. The notification must include the date and time of access, the reason for the access, and the name and license number of all personnel involved in the access. Interview management and surveillance personnel and determine their understanding of the procedure.

C	N	2C	2N
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3. Installation and upgrades of an AKTS must be performed by licensed individuals.

C	N	2C	2N
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**ICMP - KEY CONTROL - F. DUPLICATE KEYS**

1. Duplicate copies of all restricted keys are locked in the duplicate key box located in the vault and are only accessible by the owner/operator and/or gaming manager along with another licensed employee (i.e., no one person can access duplicate keys alone). The Division requires dual locks for the duplicate key box. Additionally, the duplicate keys to the vault must be properly secured in a manner that limits access to authorized personnel only. If there is no vault, the duplicate keys are stored in a two-keyed locked box, under surveillance, located in a secure area limiting access to authorized personnel only. One key to the duplicate key locked box is maintained in box 1. The second key to the duplicate key locked box is maintained in box 2. Verify where the duplicate key box is located and the surveillance coverage. Verify where the two keys to access the duplicate key box are stored.

C	N	2C	2N
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2. One duplicate key control log sheet is used per restricted key. Each time a restricted duplicate key is received from the locksmith, an entry is made to that key's respective duplicate key control log. When the individual duplicate keys logs are full, the licensee must take the current inventory amount and carry it over to the new log in the area labeled (number of keys from previous page). Judgmentally select at least three different restricted keys and ensure the number of duplicate keys in the duplicate key box agrees to the number of keys listed on the duplicate key control log (one log per key). Determine if the forms have been completed correctly.

C	N	2C	2N
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3. Duplicate restricted keys must be inventoried at least twice a year. This may be accomplished in conjunction with the internal compliance officer completing the compliance checklist. The inventory must be documented. This documentation must include, at a minimum, the names, signatures, license numbers of the individuals performing the inventory count, the date the inventory was performed, and the results of the inventory. Review the documentation and determine compliance with this procedure.

C	N	2C	2N
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4. Upon receiving/removing duplicate keys, the duplicate key control log must always include the following information:

C	N	2C	2N
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- a. Date/Time
- b. Number of Keys
- c. Number of Keys Remaining

**ICMP Compliance Checklist: Section 10, KEY CONTROL**  
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Review the documentation and determine all the required information is included.

5. Upon receiving duplicate keys from a locksmith, or making duplicate keys in-house, the duplicate key control log must be completed with the following information (see columns labeled A on the duplicate key control log in Forms section):

C	N	2C	2N
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- a. Signature and license number of individual receiving key.
- b. Number of keys remaining.

6. If a duplicate key is removed or checked out to an authorized employee for any reason, the duplicate key control log must be completed with the following information (see columns labeled B on the duplicate key control log in Forms section):

C	N	2C	2N
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- a. Signature and license number of individual issuing key.
- b. Signature and license number of individual receiving key.
- c. Reason for removal of key.
- d. Number of keys remaining.

Review the documentation and determine all the required information is included.

7. If a duplicate key is permanently removed to replace a broken key, the duplicate key control log must indicate this as the reason for removal of the key, and the columns labeled C on the log will be noted as "N/A". Review the documentation and determine all the required information is included.

C	N	2C	2N
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8. When the duplicate key is returned, the duplicate key control log must be completed with the following information (see columns labeled C on the duplicate key control log in Forms section). If the duplicate key is transferred to another authorized individual before checking the key in, this must be noted on the log:

C	N	2C	2N
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- a. Signature and license number of individual returning the key.
- b. Signature and license number of individual accepting the key.
- c. Number of keys remaining.

Review the documentation and determine all the required information is included.

**ICMP - KEY CONTROL - G. PROCEDURES FOR NON-OPEN HOURS**

1. If a licensee is not open twenty-four (24) hours a day and utilizes a manual key control environment, the keys to access the restricted two-keyed locked boxes must be secured in a manner that precludes access to the restricted key boxes by any one individual. The licensee must document and have knowledge of where all of the keys to the two-keyed locked boxes are at all times. This could be accomplished through the use of a key log. The key to access the non-restricted key box must also be securely stored in a manner that precludes access by unauthorized individuals. Interview management, cage and surveillance

C	N	2C	2N
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personnel to determine their understanding of this process.

2. If a licensee is not open twenty-four (24) hours a day and utilizes an AKTS environment, it must be ensured that all restricted keys which are not in use (e.g., by the drop or count teams, slot repair, etc.) have been returned to the AKTS at the close of the gaming day. Interview management, cage and surveillance personnel to determine their understanding of this process.

C	N	2C	2N
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**ICMP – GENERAL - D. INTERNAL CONTROLS & THE CONTROL ENVIRONMENT**

1. Pursuant to CLGR 30-1610(2), each licensee shall establish its own internal control procedures including accounting procedures, reporting procedures, and personnel policies for the purpose of determining the licensee’s liability for taxes, fees, and exercising effective control over the licensee’s internal fiscal affairs. The licensee’s procedures must incorporate the ICMP requirements as established by the Division, or alternative requirements approved by the Division. Ensure that approved ICMP variances for key control are located in the area impacted by the variances.

C	N	2C	2N
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**Additional Comments:**

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