

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

---

**TABLE OF CONTENTS**

**SECTION**

**1. GENERAL SECTION**

|    |  |    |
|----|--|----|
| A. | General .....  | 1  |
| B. | Information submitted to the Division prior to opening ..... | 1  |
| C. | Responsible Gaming .....                                     | 2  |
| D. | Other matters .....  | 3  |
| E. | Internal controls and the control environment .....          | 4  |
| F. | Key employees .....  | 5  |
| G. | Gaming industry bulletins .....                              | 5  |
| H. | Gaming forms .....   | 6  |
| I. | Gambling payment intercept (GPI) .....                       | 7  |
| J. | Casino closing procedures .....                              | 11 |

**2. TABLE GAMES**

|    |   |    |
|----|---|----|
| A. | General .....                               | 1  |
| B. | Additional payout procedures .....          | 4  |
| C. | Manual Fill procedures .....                | 4  |
| D. | Credit procedures .....                     | 6  |
| E. | Table opening and closing procedures .....  | 7  |
| F. | Table games jackpot payout procedures ..... | 8  |
| G. | Table games performance review .....        | 9  |
| H. | Table games tournament procedures .....     | 10 |
| I. | Table games progressive procedures .....    | 10 |
| J. | Non-Cashable Chips .....                    | 11 |
|    | Forms                                       |    |

**3. PLAYER BANKED POKER**

|    |   |   |
|----|---|---|
| A. | General .....   | 1 |
| B. | Jackpot award procedures .....                        | 2 |
| C. | Poker imprest exchange and inventory procedures ..... | 4 |
| D. | Table games tournament procedures .....               | 5 |
|    | Forms   |   |

**4. SLOT MACHINES**

|    |  |   |
|----|--|---|
| A. | Equipment control/testing .....                          | 1 |
| B. | Machine access .....                                     | 3 |
| C. | Device requirements .....                                | 5 |
| D. | Device storage, movement reporting and destruction ..... | 6 |

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

---

|    |   |    |
|----|---|----|
| E. | Testing.....  | 6  |
| F. | E-Prom duplication .....                                | 7  |
| G. | Gaming systems .....                                    | 7  |
| H. | Gambling payment intercept (GPI).....                   | 7  |
| I. | Jackpot payouts, additional payouts and slot fills..... | 7  |
| J. | Pouch pays .....  | 11 |
| K. | Short pays.....   | 15 |
| L. | Disputed jackpots & patron disputes .....               | 15 |
| M. | Unclaimed jackpots.....                                 | 15 |
| N. | Additional payouts .....                                | 17 |
| O. | Progressive slot machines .....                         | 18 |
| P. | Slot tournament procedures .....                        | 20 |
|    | Forms   |    |

**5. TABLE GAMES, SLOT AND KIOSK DROP AND COUNT PROCEDURES**

|    |                                  |    |
|----|----------------------------------|----|
| A. | General.....                     | 1  |
| B. | Table games drop and count ..... | 6  |
| C. | Slot machine drop and count..... | 12 |
| D. | Kiosk drop and count .....       | 22 |
| E. | Hopper drop and count.....       | 23 |
|    | Forms                            |    |

**6. GAMING SYSTEMS**

|    |   |    |
|----|---|----|
| A. | General .....   | 1  |
| B. | Documentation requirements .....                        | 3  |
| C. | Physical security .....                                 | 4  |
| D. | Logical security.....                                   | 4  |
| E. | Segregation of duties.....                              | 5  |
| F. | Network topology .....                                  | 6  |
| G. | Ramp (Remote Access, Maintenance and Problem) log ..... | 6  |
| H. | Database security .....                                 | 8  |
| I. | Wireless.....   | 9  |
| J. | Backup and recovery.....                                | 11 |
| K. | Slot machine management .....                           | 12 |
| L. | Employee confirmation and termination .....             | 13 |
|    | Forms   |    |

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

---

**7. GAMING SYSTEMS TESTING**

|    |  |    |
|----|--|----|
| A. | General.....   | 1  |
| B. | Testing requirements for gaming systems (Slots, TITO, EPCS)..... | 2  |
| C. | Converting from one gaming system to another.....                | 8  |
| D. | Testing requirements for pit systems.....                        | 9  |
| E. | Testing requirements for cage systems.....                       | 10 |
| F. | Testing requirements for wireless handheld validation units..... | 11 |
| G. | Testing requirements for jackpot payout/fill slip testing.....   | 11 |
|    | Forms  |    |

**8. TICKET IN/TICKET OUT, PURCHASE TICKETS AND SLOT COUPONS**

|    |   |    |
|----|---|----|
| A. | General.....                                  | 1  |
| B. | Floor operations.....                         | 3  |
| C. | Cashier cage.....                             | 6  |
| D. | Count procedures.....                         | 9  |
| E. | Accounting procedures.....                    | 9  |
| F. | Issuance of purchase tickets and coupons..... | 12 |
| G. | Ticket issuance/redemption kiosks.....        | 14 |
| H. | Wireless handheld validation device.....      | 16 |
|    | Forms   |    |

**9. CASHIER**

|    |  |    |
|----|--|----|
| A. | General.....   | 1  |
| B. | Key authorization logs or signature cards.....                 | 4  |
| C. | Transfers to/from vault.....                                   | 5  |
| D. | Coin room.....   | 7  |
| E. | Stored chips and tokens.....                                   | 7  |
| F. | Non-gaming transactions.....                                   | 7  |
| G. | Inventory count.....   | 8  |
| H. | Imprest banks.....   | 9  |
| I. | Change person procedures.....                                  | 10 |
| J. | Pouch pay bank check out and in procedures.....                | 12 |
| K. | Ticket In/Ticket Out validation and redemption procedures..... | 12 |
| L. | Recording transactions.....                                    | 12 |
| M. | Locked dispensing machines.....                                | 13 |
| N. | Check cashing.....   | 14 |
| O. | Kiosk fill procedures.....                                     | 15 |
| P. | Jackpot Kiosks.....  | 16 |
| Q. | Currency transactions record keeping.....                      | 18 |
|    | Forms  |    |

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

---

**10. KEY CONTROL**

|    |   |    |
|----|---|----|
| A. | General.....                                | 1  |
| B. | Key control environment .....               | 3  |
| C. | Key control logs.....                       | 8  |
| D. | Table games and pit podium key control..... | 9  |
| E. | Automated key tracking system.....          | 10 |
| F. | Duplicate keys.....                         | 13 |
| G. | Key Procedures for non-open hours .....     | 14 |
|    | Forms                                       |    |

**11. ACCOUNTING**

|    |  |    |
|----|--|----|
| A. | General.....                                       | 1  |
| B. | Table games .....                                  | 5  |
| C. | Slot machines.....                                 | 11 |
| D. | Cashier .....                                      | 32 |
| E. | Key control.....                                   | 34 |
| F. | Forms control .....                                | 35 |
| G. | Ticket In/Ticket Out procedures .....              | 35 |
| H. | Kiosk procedures .....                             | 35 |
| I. | Wireless procedures .....                          | 36 |
| J. | Minimum bankroll requirements .....                | 37 |
| K. | Monthly gaming tax return .....                    | 38 |
| L. | Standard financial statements .....                | 40 |
| M. | Audited financial statements.....                  | 40 |
| N. | Internal compliance officer .....                  | 40 |
| O. | Statewide and multi-state multi-link systems ..... | 42 |
| P. | Chip and token procedures.....                     | 43 |
|    | Forms  |    |

**12. ELECTRONIC IMAGING SYSTEMS**

|    |  |   |
|----|--|---|
| A. | General.....   | 1 |
| B. | Document control and retention requirements.....       | 1 |
| C. | Minimum requirements.....                              | 2 |
| D. | Intent to use an imaging system.....                   | 3 |
| E. | Planning for implementation of an imaging system ..... | 3 |
| F. | Field testing of the imaging system .....              | 6 |
| G. | Approval .....   | 7 |
| H. | Ongoing requirements.....                              | 8 |

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

---

**13. SURVEILLANCE SYSTEM STANDARDS**

A. General ..... 1  
 B. Definitions..... 2  
 C. Equipment..... 2  
 D. Cashier cages, keno writer stations, vaults, count rooms, elevators and kiosks ..... 3  
 E. Table games ..... 5  
 F. Slot areas ..... 7  
 G. Other standards ..... 7  
 H. Digital Surveillance ..... 9  
 Forms

**14. DEALER TIPS**

A. General requirements ..... 1  
 Forms

**15. TABLES GAMES EQUIPMENT**

A. Card, tiles and dice inventory ..... 1  
 B. Card, tiles, big 6 wheel and dice inspection and control ..... 2  
 C. Card, tiles and dice cancellation/destruction ..... 4  
 D. Marking up roulette chip values; chip inventory ..... 4  
 E. Inspection and security procedures for roulette equipment ..... 5  
 F. Communication equipment..... 5  
 G. Shufflers.....5

**16. ELECTRONIC PROMOTIONAL CREDIT SYSTEMS (EPCS)**

A. General..... 1  
 B. Testing requirements for EPCS ..... 3

**17. KENO**

A. General.....1  
 B. Keno Workstation Drawers.....6  
 C. Keno Currency Exchanges.....9  
 D. Keno Credits.....10  
 E. Keno Kiosk.....11  
 F. Keno Gambling Payment Intercept.....14  
 G. Unclaimed Keno Winning Payouts.....14  
 H. Progressive Keno Games.....14  
 I. Keno Tournament Procedures.....16  
 J. Tips.....17

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

---

**TERMINOLOGY**