

3772-10-26 Key controls

(A) Each casino operator's ~~licensee or applicant's~~ internal controls shall establish procedures for securing and accurately tracking keys and locks. The key and lock inventory controls shall include procedures for:

(1) Establishing a key custodian who is responsible, along with the casino operator itself, for maintaining the casino operator's keys and locks;

(2) Maintenance of inventory ledgers by identified, authorized personnel for purposes of documenting:

(a) The identification of the key;

(b) Licensed employees who are authorized to use the key;

(c) The requisitioning of keys and locking devices from vendors;

(d) The receipt of blank key stock;

(e) The storage and issuance of keys and locking devices;

(f) Any loss, removal from service, and subsequent replacement of keys and locking devices;

(g) The destruction of keys and locking devices; and

(h) The results of physical inventories;

(3) The storage of duplicate keys and locking devices, including a physical description of any storage location and the identification of authorized personnel in control of such location;

(4) The destruction of keys and locking devices, including documentation detailing in whose presence any destruction shall occur; and

(5) Physical inventories of all keys and locking devices at least once every three months by a licensed employee who would not be acting in an incompatible function.

(B) The plan shall include procedures for securing sensitive keys. Sensitive keys include:

(1) Drop box content keys;

(2) Bill validator canister content keys;

(3) Drop box table slide release keys;

(4) Drop and bill validator canister reset keys;

- (5) Drop trolley door keys;
- (6) Slot machine access keys;
- (7) Count room door key;
- (8) Card and dice storage room keys (dual access required);
- (9) Table game chip inventory cover key;
- (10) Pit stand keys;
- (11) Keys to areas housing a computer that controls table game progressive payout wager systems;
- (12) The slot management system access key;
- (13) The jackpot or slot re-impressment kiosk keys;
- (14) The self-redemption or bill breaker kiosk keys;
- (15) The change cart key;
- (16) The key for each table game's drop box;
- (17) The key for the table game drop box release;
- (18) The keys for the bill validator and table drop storage cart;
- (19) The key for each table game's chip bank cover;
- (20) The key for each progressive game's controller;
- | ~~(21) The key for each progressive game's reset switch;~~
- | (2~~1~~2) The keys for the reserve chip storage;
- | (2~~2~~3) The keys for the card and dice storage area;
- | (2~~3~~4) The keys for the secondary chip storage area;
- | (2~~4~~5) The access door key to any cage, slot bank, or redemption booth;
- | (2~~5~~6) The window key to any cage, slot bank, or redemption booth;
- | (2~~6~~7) The keys to the vault;

| (278) The keys to the count room; and

| (289) Any key not listed in this paragraph that controls access to any cash or chip storage area.

(C) If a sensitive key is lost or becomes missing, all locks that the key fits shall be changed immediately.

| (D) Each casino operator's ~~licensee or applicant's~~ internal controls shall include the following information:

(1) The location of each sensitive key and key box;

(2) Each employee or contract job title who is authorized to access the sensitive key boxes;

(3) The procedure for issuing and controlling sensitive keys;

(4) The sensitive key names, location, and persons authorized to sign out each sensitive key;

(5) The location and custodian of each duplicate sensitive key; and

(6) Continuous surveillance coverage of each key box.

| (E) If a casino operator ~~licensee~~ chooses to use an automated key control system, the casino operator's ~~licensee or applicant's~~ internal control system shall include the following information:

(1) A description of the automated system and its configuration, including how access is controlled;

(2) The system's ability to provide scheduled and on-demand reports for a complete audit trail of all access, including the following:

(a) The identity of the key box;

(b) The identity of the keys;

(c) The date and time a key was removed;

(d) The date and time a key was returned;

(e) Any unauthorized attempts to access the key box;

(f) All entries, changes, or deletions in the system and the name of the employee performing the entry, change, or deletion; and

(g) The employee position that is in charge of any automated key control system;

- (3) Each employee position that is authorized to enter, modify, and delete any keys;
- (4) Each employee position that is authorized to access the system;
- (5) Details about the alarms being used to signal for the following events:
 - (a) Overdue keys;
 - (b) Open key box doors;
 - (c) Unauthorized attempts to access; and
 - (d) Any other unusual activities;
- (6) Any system override procedures; and
- (7) A procedure for the notification of a commission gaming agent on duty if a partial or complete system failure occurs.
- (F) All sensitive keys may only be issued after proper completion of a sensitive key log, which shall include:
 - (1) The date;
 - (2) The key number or ring number;
 - (3) The name of the individual or the automated key box issuing the key;
 - (4) The name of the individual receiving key;
 - (5) The time the key was signed out;
 - (6) The time the key was signed in;
 - (7) The name of the individual returning key; and
 - (8) The name of the individual or the automated key box receiving the returned key.
- (G) The licensed employee who signs out a sensitive key shall maintain custody of the key until the key is returned to the sensitive key box. Keys shall not be passed to other individuals.
- (H) An inventory log of duplicate keys shall be maintained documenting the current issuance, receipt and inventory of all duplicate sensitive keys. The duplicate key inventory log shall include the following information:

- (1) The date and time;
- (2) The key name that shall be identical to the key name on the sensitive key access list;
- (3) The key number;
- (4) The number of keys in the beginning inventory;
- (5) The number of keys added or removed;
- (6) The number of keys in the ending inventory;
- (7) The reason for adding or removing keys;
- (8) The signatures of the two licensed individuals accessing the key box; and
- (9) The signature of the individual receiving the key.