



**INDIANA
GAMING
COMMISSION:
GAMING ENTITY
LICENSING
GUIDANCE**

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Definitions

“Casino Gaming System” means any system that affects the integrity of gaming, revenue, or outcome of the game for slots and table games.

“Criminal background check” as set forth in IC § 4-38-9-1, a sports wagering vendor must conduct a criminal background check on newly hired employees related to the conduct of sports wagering. Sports wagering vendors must also conduct annual checks on all existing employees engaged in activities related to the conducting of sports wagering. The criminal background checks must include a search for criminal history and any charges or convictions involving corruption or manipulation of sporting events and any association with organized crime. **Please note, information regarding the sports wagering vendor’s plan to meet this requirement must be outlined within its internal controls.**

“Gaming Entity(ies)” mean corporations, casinos, Suppliers and/or Sports Wagering Vendors.

“LAM” means the IGC’s Licensing and Application Management System.

“Occupational license” means a license issued by the commission under IC Ch. 4-33-8.

“Personal identifying information (PII)” is herein defined as any sensitive information that can be used to distinguish or trace an individual’s identity. For the purposes of determining whether an occupational license is required, the following data points constitute PII: DOB, SSN, DLN, Passport Number, or financial or bank account information.

“Regulated control program component” means the files of the sports wagering system that are identified and certified by the Indiana Independent Testing Lab.

“Sports wagering system” means all equipment and software used in conjunction with the sports wagering operation, including, but not limited to, the following: Sports wagering interactive components, including all hardware, software, and associated equipment that comprise the sports wagering platform for the purpose of authorizing sports wagering and online and mobile sports wagering.

“Sports wagering vendor” means an entity authorized to conduct sports wagering activities in the State of Indiana on behalf of its certificate holder at the certificate holder's licensed facility or through mobile devices described under IC 4-38-5-12, or both.

“Supplier” means a provider of goods or services to a Casino Gambling Operation under a Supplier License issued pursuant to IC 4-33-7 or IC 4-38.

Initial Gaming Entity Application Process

Vendors of certain types of equipment, devices, and services to Indiana casino gambling operations must possess a license issued by the Indiana Gaming Commission ("Commission"). The Commission licenses vendors of products or services that directly relate to gaming operations or affect the flow of money obtained as a direct result of gaming operations. The Commission also has the authority to require licensure of any vendor that the commission deems necessary to ensure compliance with applicable gaming laws.

In order to make a determination regarding licensure requirements, the Commission requests that interested vendors submit a [Gaming Entity Inquiry Form](#).

Once Commission staff determines whether a license is required, Commission staff will contact the vendor with further information, if a Gaming Entity license is required, and if so, which type. The IGC has four types of Gaming Entity Vendor licensing:

- Types of Gaming Entity Licensure
 - Casino (limited in total number by IN Statute, not covered in this guidance)
 - Certificate of Authority (limited in total number by IN Statute, not covered in this guidance)
 - Registrant (not covered in this guidance)
 - Sports Wagering Service Provider
 - Sports Wagering Vendor
 - Supplier

Gaming Entity Application Submission

For Sports Wagering Vendors and Suppliers, once the IGC Legal Division has made a license determination, the IGC Investigations Division will contact the company to request ownership and internal organizational charts and information. The company will be provided with the appropriate entity application at that time. Submission instructions are contained in the application instructions section.

SWV Internal Control Standards

Sports Wagering Vendor applicants must submit the entity application and draft internal controls for review prior to submitting any occupational license applications. When the application and internal controls have been reviewed by the IGC, the company will be notified and directed to submit its associated PD-1 applications.

Please use the following guidelines when preparing your internal controls submission:

- **A mobile sports wagering [internal control checklist](#) must be submitted with your draft internal controls. Please note any items that may not be applicable to your operation and specify the reason.**
- The mobile sports wagering internal controls shall be written in a formal, professional style using standard English. Grammar and punctuation errors should be kept to a minimum. Submissions that have not been proofread will not meet minimum standards for temporary licensure.
- The mobile sports wagering internal controls shall include a table of contents.
- The mobile sports wagering internal controls shall include a section for each individual sports wagering topic (i.e., Users, System, Geofence/Geolocation, Server, Wagers, Accounting, AML Compliance Standards, Patron Accounts, Patron Complaints, Prohibited Patrons, Responsible Gaming and Problem Gambling and Terms and Conditions, etc.).
- Mobile sports wagering internal controls shall be submitted in a Microsoft Word document for the initial review process. Once a temporary vendor license is issued, the Sports Wagering Division will work with the vendor to finalize approval of the internal controls prior to launch.
- Following the IGC's initial review, if necessary, any revisions to the mobile sports wagering internal controls shall be red lined for easy review.

If you have any questions regarding internal controls, please contact the Sports Wagering Division at SWapps@igc.in.gov.

Issuance of a Temporary Gaming Entity License

Sports Wagering Service Providers

The temporary license allows the Sports Wagering Service Provider to provide its products and services to Indiana casino or Sports Wagering Vendor licensees. The temporary license is valid for one year and cannot be transferred. If necessary, the temporary license may be renewed.

Sports Wagering Vendors

A temporary vendor license allows the Sports Wagering Vendor to conduct sports wagering in the State of Indiana on behalf of its certificate holder at the certificate holder's licensed facility or through mobile devices described under IC 4-38-5-12, or both. All employees who have any duty, authority, or function relating directly or indirectly to the conduct of sports wagering will be required to hold an occupational license in accordance with 68 Ind. Admin. Code § 2-3-1. The temporary SWV license does not create a right or privilege to continue conducting business if the application for a SWV license to conduct sports wagering is rejected by the Commission. Furthermore, the Commission may rescind the temporary license at any time, with or without notice, if the Commission is informed that the company's suitability may be at issue and the company fails to cooperate with the Commission in the Commission's investigation into the qualifications and suitability.

The temporary vendor license does not authorize the Sports Wagering Vendor to begin conducting sports wagering. A Sports Wagering Vendor licensee must receive express authorization from the Commission prior to offering any sports wagering activities under IC 4-38.

The temporary license is valid for one year after the date the Sports Wagering Vendor is given express authorization to conduct sports wagering and cannot be transferred. If necessary, the temporary license may be renewed by submitting the administrative fee described in IC 4-38-6-6.

Express Authorization and Launch Requirements

Sports Wagering Vendors will work directly with the Sports Wagering Division toward express authorization to launch a sportsbook after the temporary license is granted.

Suppliers

The temporary license allows the Supplier to provide its products and services to Indiana casino or Sports Wagering Vendor licensees. If the Supplier intends to provide any other products or services to Indiana casino or SWV licensees, the Supplier must seek advance permission from Commission staff.

The temporary license is valid for one year and cannot be transferred. If necessary, the temporary license may be renewed by following the renewal procedures found in Ind. Code § 4-33-7-8, and 68 Ind. Admin. Code § 2-2 and paying the appropriate license renewal fee.

Individual Licensing

The Indiana Gaming Commission (“the Commission”) issues licenses to people across the state, the country, and even the globe. Because of the number of licenses, there is a specific way Gaming Entities, and their employees, must submit their information for licensure.

Certain Casino, Sports Wagering Vendor, and Supplier employees will require a gaming license according to IGC issued licensing standards. All license holders must be of good moral character and reputation. The Indiana Gaming Commission (“the Commission”) issues three license levels, and two types of licenses:

- Levels
 - Level 1: Key Persons (L1)
 - Level 2: Gaming Employees (L2)
 - Level 3: Not Utilized for Supplier and Vendor Gaming Entities
- Type
 - Temporary
 - Permanent

Certain employees are required to have licenses. Lower-level positions are often Level 2 (L2). The application procedure and background investigation are not as in-depth as a key person, or a Level 1 (L1) license, but if a license is required then the license must be obtained before these employees can perform duties.

Licensing and Application Management System (LAM)

All licenses with the IGC are maintained in the Licensing and Application Management system (LAM). It is the responsibility of the Gaming Entity to ensure accuracy of what is entered into the system, including the accuracy of job titles and levels for each individual licensed. If anything is incorrect, please submit an update request in LAM or notify IGC via email at Occllc@igc.in.gov immediately. If individuals are found to be working in incorrect/not approved positions or at a different level than approved, it may result in referral for Disciplinary Action to the IGC Compliance Committee.

When a Gaming Entity becomes licensed, IGC will provide more information on LAM, including training videos and the LAM Manual.

Licensure

All licenses require a background check and suitability investigation by the Commission. The licenses must be kept up to date. Gaming Entity licensees must notify the Commission of any changes to name, address, or other personal information quarterly, as explained in the "Renewal and Updates" section of this manual.

Applications must be submitted to the IGC within 30 days of the appointment to or transfer to position that requires licensure.

Notices of license termination are required to be submitted in LAM within 15 days of the change. The licenses are also required to be renewed annually.

If the Commission is not updated or a license is not renewed in a timely manner, the Commission may take disciplinary action against the Gaming Entity.

Level Designation Process

Suppliers

The purpose of this section is to provide guidance regarding the distinction between a Level 1 and Level 2 occupational license. All Supplier occupational licenses will qualify as a Level 1 or Level 2. Level 3 occupational licensing is reserved for Casino occupational licensing under IC art. 4-33 or IC art. 4-35.

Level 1 occupational licenses require the submission of the PD-1 application. Level 2 occupational licenses require the submission of the PD-2 application. The application forms are available on the IGC's [website](#). Please note, every Supplier is different and utilizes different job titles. The titles below are offered by way of example, and you should not solely rely on the specific job title used below when coming forward for licensure. Improperly designating an employee as a Level 2 when they should be a Level 1 may subject the Supplier to disciplinary action. In the event you have questions, do not hesitate to reach out to the IGC Gaming Administrator at OcclLic@igc.in.gov to receive guidance. The request must provide sufficient detail regarding the employee's position, responsibilities, and access to the information contemplated below in Section III.

Please be aware that if any duties in the licensing guidance requiring licensure are being performed by the Sports Wagering Vendor's third-party partners, the Vendor is responsible to communicate those licensing requirements to the partner and make sure appropriate licensing has been implemented.

- I. Occupational license, Level 1, includes the following positions or their equivalent:
 - A. Chief Executive Officer;
 - B. Chief Financial Officer/Chief Accounting Officer;
 - C. Chief Commercial Officer;
 - D. Chief Operating Officer;
 - E. Chief Technology Officer;
 - F. VP/Director of Sales
 - G. Chairperson/Board Member/Director/Secretary or any combination thereof;
 - H. Chief Compliance Officer/Director of Compliance;

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- I. Chief Legal Officer/Director of Legal/General Counsel;
 - J. Chief Technology Officer/IT Security Officer/Chief Cybersecurity Officer;
 - K. Key persons, as defined by 68 IAC 1-1-57;
 - L. Substantial owners, as defined by 68 IAC 1-1-86; and
 - M. Any other employee of the Supplier whom the IGC deems necessary, to ensure compliance with Ind. art. 4-33, Ind. art. 4-35, and Ind. art. 4-38 to hold an occupational license, Level 1. This includes those employees already reviewed by the IGC and determined to be Level 1 licensees.
- II. The following employees shall obtain an occupational license, Level 2:
- A. Any employee of a Supplier whose duties meet the requirements for licensure in Sections III, below, and who are not employees described in Section I above; and
 - B. Any other employee of a Supplier whom the IGC deems necessary to ensure compliance with IC art. 4-33, IC art. 4-35, and IC art. 4-38 to hold an occupational license, Level 2.
- III. Occupational Licensure Guidance
- A. Access to PII:
 - i. Access to Indiana patron PII requires an occupational license.
 - B. Indiana casino access:
 - i. Physical access to a gaming floor to perform any maintenance, installation, or work on any casino gaming system, EGD, table, kiosk, or terminal on any casino gaming floor or sportsbook;
 - ii. Physical access to sensitive areas in casinos to service equipment;
 - iii. Sales representatives that have physical access to a gaming floor or other sensitive area more than 12 times per year total for all Indiana Casinos; or
 - iv. Engineers and developers of regulated gaming equipment must obtain an occupational license.
 - C. Server Access:
 - i. All individuals responsible for authorizing a release or performing a system upgrade to an Indiana casino gaming system or an Indiana sports wagering system must obtain an occupational license.
 - ii. Remote Access to Casino Gaming Systems: any employee that has remote access to any Indiana casino gaming system is required to obtain an occupational license.¹
 - iii. Other employees with incidental access to an Indiana sports wagering system do not require an occupational license, so long as internal controls are established preventing those employees from changing any of the casino wagering system's Indiana regulated control program components.
 - D. Department Guidance:
 - i. Accounting/Finance:
 - 1. Chief Financial Officer, or equivalent top line manager/controller must obtain an occupational license, Level 1.

¹ Prior to accessing any casino gaming system remotely, the Supplier must have first obtained written approval from the IGC, pursuant to the Memorandum issued on November 6, 2017.

2. Any employee of a Supplier whose duties include accounting and auditing functions and whose duties relate to money obtained as a result of an Indiana casino gaming system or an Indiana sports wagering system.
 3. To the extent any Accounting Financial Department employee is covered by Supplier Section III (A-D) will require licensure.
- ii. Engineering/Product Development/IT:
1. The Supplier's top IT personnel overseeing any gaming operations, must obtain an occupational license, Level 1.
 2. Any employee of a Supplier whose duties are performed on an Indiana casino floor or in sensitive areas and whose duties affect gaming or regulated equipment, including the maintenance or repair of any casino gaming systems.
 3. Employees that meet the criteria set out in Supplier Section III (A-D).
- iii. Legal/compliance:
1. Each Supplier must have at least one designated individual licensed who will be responsible for communicating with the IGC's Compliance Division regarding settlements for regulatory violations.
 2. Licensing required only as it pertains to employees that meet the criteria of Supplier Section III (A-D).
- iv. Marketing/social media/promotions:
1. Licensing required only as it pertains to employees that meet the criteria of Supplier Section III (A-D).
- v. Sales:
1. The Supplier's top Sales position overseeing gaming sales must obtain an occupational license, Level 1.
 2. Any employee of a Supplier who has primary responsibility for sales to Indiana casinos.
 3. To the extent any Sales Department employee is covered by Supplier Section III (A-D) will require licensure.
- vi. Other Departments: On a case-by-case basis, Suppliers are free to request the IGC review of any additional positions that fall outside the scope of the positions and departments described herein. Requests must be sent to IGC's Gaming Administrator at OccLic@igc.in.gov with the information outlined in the beginning of the section.

Sports Wagering Vendors

The purpose of this section is to provide guidance regarding the distinction between a Level 1 and Level 2 occupational license. All sports wagering occupational licenses will qualify as a Level 1 or Level 2. Level 3 occupational licensing is reserved for occupational licensing under IC art. 4-33 and IC art. 4-35.

Level 1 occupational licenses require the submission of the PD-1 application. Level 2 occupational licenses require the submission of the PD-2 application. The application forms are available on the IGC's [website](#). Please note, every sports wagering vendor is different and utilizes different job titles.

The titles below are offered by way of example and you should not solely rely on the specific job title used below when coming forward for licensure. Improperly designating an employee as a Level 2 when they should be a Level 1 may subject the sports wagering vendor to disciplinary action. In the event you have questions, do not hesitate to reach out to the IGC Gaming Administrator at OcclLic@igc.in.gov to receive guidance. The request must provide sufficient detail regarding the employee's position, responsibilities and access to the information contemplated below in Section III.

- I. Occupational license, Level 1, includes the following positions or their equivalent:
 - A. Chief Executive Officer/President/Chairperson/Director;
 - B. Chief Financial Officer;
 - C. Chief Marketing Officer;
 - D. Chief Operating Officer;
 - E. Chief Technology Officer;
 - F. Director of Compliance;
 - G. Director of Legal/General Counsel;
 - H. Director of Online or Sportsbook Operations;
 - I. Director of Trading/Risk;
 - J. IT Security Officer/Chief Cybersecurity Officer;
 - K. Key persons, as defined by 68 IAC 1-1-57;
 - L. Retail Sportsbook Manager;
 - M. Substantial owners, as defined by 68 IAC 1-1-86; and
 - N. Any other employee of the sports wagering vendor whom the commission deems necessary, to ensure compliance with IC art. 4-38, to hold an occupational license, Level 1. This includes those employees already reviewed by the IGC and determined to be Level 1 licensees.
- II. The following employees shall obtain an occupational license, Level 2:
 - A. Any employee of a sports wagering vendor whose duties meet the requirements for licensure in Section III, below, and who are not employees described in Section I above; and
 - B. Any other employee of a sports wagering vendor whom the commission deems necessary, to ensure compliance with IC art. 4-38, to hold an occupational license, Level 2.
- III. Occupational Licensure Guidance
 - A. Patron account information access:
 - i. An employee with the ability to access **and** change PII must obtain an occupational license.
 - ii. Read only access to PII does not require an occupational license given a sports wagering vendor's requirement to conduct criminal background checks on new hires and then annually thereafter. IC § 4-38-9-1.
 - B. Patron Account Funding Requirements:
 - i. An employee responsible for authorizing a cash credit to a patron's account must obtain an occupational license.
 - ii. An employee responsible for implementing a cash credit to credit a patron's account must obtain an occupational license.

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- iii. No occupational license is required for an employee who authorizes or implements only free bet or bonus adjustments to a patron's account.
- C. Authorization to Change or Amend Wagering Activities:
- i. An employee who is authorized to approve the settlement or resettlement of wagering markets must obtain an occupational license.
 - ii. An employee who is responsible for implementing the settlement or resettlement of wagering markets, but may not do so unilaterally, is not required to obtain an occupational license.
- D. Server Access:
- i. An employee responsible for authorizing a release or performing a system upgrade to the Indiana sports wagering system must obtain an occupational license.
 - ii. Other employees that access the sports wagering system do not require occupational licensure so long as internal controls are established preventing such an employee from changing any of the sports wagering system's Indiana regulated control program components.
- E. Indiana Retail and on-Site Employees:
- i. Sports wagering vendors must designate a retail sportsbook manager or equivalent position. This position is required to obtain an occupational license, Level 1.
 - ii. An employee of the sports wagering vendor whose duties are performed in an Indiana casino, racino, or off-track betting facility and whose employment duties affect the flow of money obtained as a direct result of sports wagering operations or other operations in the casino, must obtain an occupational license.
- F. Department Guidance:
- i. Accounting/Finance:
 1. Chief Financial Officer, or equivalent top line manager/controller must obtain an occupational license, Level 1.
 2. An employee of a sports wagering vendor who authorizes the data provided to a Certificate Holder for purposes of Indiana tax remittance must obtain an occupational license.
 3. An employee responsible for conducting the IGC required internal audit or signing off on the internal audit report must obtain an occupational license.
 4. Employees that meet the criteria set out in SWV Section III (A-F).
 - ii. Customer Service:
 1. Employees that meet the criteria set out in SWV Section III (A-F).
 - iii. Engineering/Product Development/IT:
 1. The sports wagering vendor's top IT personnel overseeing sports wagering operations, must obtain an occupational license, Level 1.
 2. The network administrator, or equivalent position, responsible for creating sports wagering vendor employee accounts and administering and maintaining privileges must obtain an occupational license.
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3. Employees that meet the criteria set out in SWV Section III (A-F).
- iv. Legal/compliance:
 1. Each sports wagering vendor must have at least one designated individual licensed who will be responsible for communicating with the IGC's Compliance Division regarding settlements for regulatory violations.
 2. Employees that meet the criteria set out in SWV Section III (A-F).
 - v. Marketing/social media/promotions:
 1. The sports wagering vendor's top Chief Marketing Officer or equivalent position must obtain an occupational license, Level 1.
 2. Employees that meet the criteria set out in SWV Section III (A-F).
 - vi. Trading/risk:
 1. Top line manager(s) will require occupational license, Level 1.
 2. Employees that meet the criteria set out in SWV Section III (A-F)
 - vii. Other Departments: On a case-by-case basis, a sports wagering vendor is free to request the IGC review of any additional positions that fall outside the scope of the positions and departments described. Requests must be sent to IGC's Gaming Administrator at OcCLic@igc.in.gov with the information outlined at the beginning of the section.

Applications

Each License Level has a corresponding application with questions specific to the licensing of that level.

Submissions

Gaming Entities should advise their new employees when completing applications that they must fully disclose their criminal history and provide any corresponding court documents at the time of application. If all charges, arrests, and convictions are not disclosed, the licensee can be subject to the revocation of their temporary license by the Commission.

Applications must be submitted to the IGC within 30 days of the appointment to or transfer to position that requires licensure. Applications are not considered submitted if they are incomplete, this includes payment, fingerprint cards, and all exhibit information. Extensions can be requested to occllic@igc.in.gov before the due date of the application and will be reviewed on a case-by-case basis.

Failure to submit a complete application by the due date may result in the Commission taking disciplinary action against the Gaming Entity.

Pages 1 and 2 of the [PD1](#) and [PD2](#) forms include instructions for completing the form, as well as what documents are required for proof of birth or citizenship.

Each application must be submitted with the application fee and two blue fingerprint cards. The [amount of the application fee](#) and [the initial application](#) can be found on the Commission website. Occupational license applications and Gaming Entity applications will continue to be submitted outside of LAM in accordance with the application instructions.

Fingerprinting Procedures for Applicants and Licensees

Indiana Code §§ 4-33-8-6 and 4-35-6.5-6 provides that applicants for licenses are required to submit fingerprints on forms provided by the Commission and those card submissions may be forwarded to the Indiana State Police pursuant to Ind. Code § 4-33-4-18. All hard copy fingerprint submissions that accompany gaming license applications must be submitted on original, blue and white, FD-258 fingerprint cards. This requirement is pursuant to the submission directive issued by the Indiana State Police ("ISP"), the entity responsible for processing fingerprint card submissions. Per the ISP directive, no other form of fingerprint card will be accepted going forward. This requirement applies uniformly to all licensing applications.

FD-258 fingerprint cards are available from the IGC by request or may be available to the Applicant or Licensee through other sources. **Submissions using recreations, reproductions, scans, copies, or anything other than original FD-258 cards of original size will not be accepted.** Card submissions must use the original FD-258 cardstock. Applications that fail to comply with this requirement will not be processed.

Approvals

When an application has been received, processed, and approved, the temporary license may be issued and available to view in LAM along with the license number. A notification will be sent to the Gaming Entity LAM user in the system upon issuance. After this has been received by the Gaming Entity, the employee is considered licensed by the State of Indiana. **Employees may not work at an Indiana casino or have access to the criteria requiring licensure described in the Level Designation Process sections of this packet before this time.**

License Types

Temporary Licenses

With exception to applicants who disclose a felony or other concerning information on their application, most applicants are issued a temporary license after a review of their application. Those with felonies can still potentially hold an Indiana License, however, they must complete the [Felony Waiver Application](#). Temporary licenses can be revoked at any point by the Commission. An applicant who receives a temporary license may work at a casino or for a Gaming Entity until a permanent license is issued or the temporary license is revoked.

Permanent Licenses

Permanent licensees have been deemed by the Commission to be suitable to receive an occupational license. This determination is done by the Commission's background and financial investigations divisions. IGC will notify the Gaming Entity via LAM of issuance of permanent licenses, and from there, the Gaming Entity may download a permanent license letter if necessary. Once a permanent license has been issued, the Gaming Entity will incur a charge for the permanent license. The Commission will issue Gaming Entities a bill quarterly that includes any permanent licensure fees.

Renewals and Updates

Every licensee is required to renew their license annually and keep their information up to date.

Renewals

All licenses must be renewed annually, including temporary licenses when applicable. Renewals can only be submitted within 60 days of their expiration date. Gaming Entities must use LAM to submit any renewals to IGC. Renewals will not be processed until payment is received for the renewal. Gaming Entities can see a live listing of renewals due, as well as when any renewals are completed, in LAM.

Late renewals may result in the Commission taking disciplinary action against the Gaming Entity.

Leave of Absence

Gaming Entities must use LAM to submit any Leave of Absence information to the IGC for licensees within 15 days of the first day of the occurrence of the leave. If an individual has an active leave of absence on their profile, they may not work in a licensed position. If an individual is found working with an active LOA in the system, the GE will be subject to disciplinary action.

Should a L1 licensee go on a leave of absence, in addition to entering the LOA into LAM, a request should also be sent to occllic@igc.in.gov to outline who the GE proposes will be filling in for the duties while the individual is on the leave.

Failure to file LOAs in LAM and/or failure to request approval for L1 interim duties may result in the Commission taking disciplinary action against the Gaming Entity.

Updates and Quarterly Reporting

Gaming Entity companies must provide the following updates to the IGC on a quarterly basis. The updates that must be submitted on a quarterly basis are:

- Complete listing of individuals who should have access to LAM: Name, title, and company email address
- Title changes for occupational licensees: utilizing LAM to submit an update by the 15th day after the close of the quarter in which the change occurred.
- Occupational licensee changes of name, address, telephone number, and/or the filing of a bankruptcy: utilizing LAM to submit an update by the 15th day after the close of the quarter in which the change occurred.
- Organizational charts: submitted via email to Occllic@igc.in.gov on or before the 15th day following the close of each quarter. All company positions involving Indiana operations must be reflected on the organizational chart, whether licensed or not. Titles held by

licensees and applicants must match the titles on file with IGC. This will be reviewed quarterly, and any discrepancies must be resolved;

- If there have been no changes to the org chart or licensee update information since the last quarterly update, email OcclLic@igc.in.gov to indicate that there have been no changes and that no updates are necessary.

Quarters are as follows: Quarter 1, January – March; Quarter 2, April – June; Quarter 3, July – September; and Quarter 4, October – December.

Certain updates must be submitted to the IGC within ten (10) or fifteen (15) days of the change or occurrence of the event. The updates that must be submitted within ten (10) or fifteen (15) days are:

- Occupational licensee updates regarding an arrest, indictment, criminal charge, conviction, or guilty plea to any felony or misdemeanor offense. To notify IGC, send an email to occllic@igc.in.gov with the details of the disclosure within 10 calendar days of the occurrence.
- License termination due to separation from the company or no longer meeting the criteria set forth in the Level Designation Process section above. The requests must be submitted through LAM as a termination request within 15 days of the separation or change in duties.
- Any other information that would affect the occupational licensee's suitability to maintain a license. To notify IGC, send an email to occllic@igc.in.gov with the details of the disclosure within 10 calendar days of the occurrence.

Terminations

Gaming Entities are required to update the Commission within fifteen (15) days of any terminations of licensees, or any changes to a licensee's position or duties which cause the employee to no longer require a license. Terminations must be sent utilizing LAM within 15 days of the separation or change in duties.

In the event you believe a L1 qualifies for relinquishment under the above guidelines, do not hesitate to reach out to the IGC Gaming Administrator at OcclLic@igc.in.gov to receive guidance. The request must provide sufficient detail regarding the employee's position, responsibilities, and access to the information contemplated in the Level Designation Process section of this document.

Should a L1 licensee be terminated, in addition to entering the termination into LAM, a request should also be sent to occllic@igc.in.gov to outline who the GE proposes will be responsible for the duties of the vacant position in the interim. The email should also include if the GE is replacing the individual or eliminating the position.

Late submissions of terminations may result in the Commission taking disciplinary action against the Gaming Entity.

Licensee Badge Requirements

All Gaming Entity employees servicing Indiana casinos are required to always display their badge.

First Visit to an Indiana Casino

Upon an employee's first visit (or first visit without a license or badge) to an Indiana casino, they will need to acquire a licensee badge. This is different from a temporary visitor or vendor badge given to visitors who need to be on the casino floor.

Once an employee has their Gaming Entity license badge, they will be able to utilize it at the casino where they are contracted to work.

To obtain a licensee badge, the employee should request to speak with an Indiana Gaming Commission Agent as soon as they get to the casino. From there, they will let the Agent know they already have a Gaming Entity occupational license and require a licensee badge for access to the casino. The Agent will then escort them to the Commission office, take their picture, and issue them a badge.

Gaming Entity employees will not be able to utilize visitor or vendor badges to work on any Indiana gaming floors without approval from the Commission.

Unlicensed Gaming Entity employees will be denied access to the casino floor upon arrival.

Remote Employees

Some Gaming Entities may not require their employee to frequent the Indiana casinos physically, however they may deal with sensitive information from Indiana players and casinos. If this is the case, they will not be issued a badge. If they ever require to be on the casino floor, however, they will have to follow the instructions presented above.

Gaming Entity Licensing Requirements

Once an entity has been issued a permanent Gaming Entity license, certain information must be provided to the Commission, including reports and renewal information.

Continual Reporting Requirements

When a licensed Gaming Entity becomes aware of any of the following events, written notice must be provided to the Executive Director:

- Change in status of the Gaming Entity's License
- Violations of Rules of the Commission
- Civil litigation filed against the Gaming Entity
- Criminal, civil, administrative action, or investigation initiated by a government entity
- Claims made by a government entity regarding any tax liability
- Criminal, civil, administrative, or tax action by or against a key person, substantial owner, or affiliate
- Bankruptcy, receivership, or debt adjustment
- Compliance review by the IRS
- Notice requested by the Executive Director

For more information on general reporting requirements, please see [68 IAC 1-5-1](#).

Additional Reporting Requirements

In addition to the general reporting requirements, Gaming Entities are also required to do the following:

- Provide notice of a public offering
- If not publicly traded:
 - File a quarterly report with the Director of Background Investigations and Director of Financial Investigations that lists those persons who hold an interest in the licensed company
- If publicly traded:
 - Annually provide the Commission with a list of record holders and beneficial owners of voting securities;
 - Report an election or appointment of a director or any officer;
 - Provide notice of disposed voting securities;
- File any other document requested by the commission
- See Appendix A for a full listing of all reports required to be submitted to the IGC.

How to Submit Reports

When a general or additional report is submitted to the Commission, it is required to be submitted in a specific fashion, and to the designated email address. The report's file should be named as below, in pdf format:

2019.05.01 Required Report Name, three letter acronym for entity

Please see the memo [here](#), issued April 11, 2017. If you are unsure what the Gaming Entity acronym given to your entity is, feel free to send an email to Reports@igc.in.gov.

Example:

If the May 1, 2017 required report name is Notification of SEC Filing, and the entity submitting the report is Bally, the report title and email subject line should reflect:

2017-05-01 Notification of SEC Filing BGI

This report, in pdf format, should then be sent with the name above in the subject line to Reports@igc.in.gov.

Renewal Requirements

A Gaming Entity's license is valid for one year from the date the permanent license was issued or if a company is not yet in permanent status by the time of their renewal, the license is valid for one year from the date the temporary license was issued. The IGC sends a renewal reminder to the Gaming Entity 60 days before the expiration of the company's license. If for any reason the renewal reminder is not received by the Gaming Entity, the renewal is still required to be submitted on time.

To prevent the license from expiring, the Gaming Entity must renew its license annually through the following process:

Suppliers:

- Submission of the Gaming Entity's Annual Renewal Request
- Payment of the \$7,500 annual renewal fee

SWVs:

- Submission of the Gaming Entity's Annual Renewal Request
- Payment of the \$50,000 annual administrative fee

The materials above should be received by the IGC no later than 30 days prior to the license's expiration to ensure the renewal request is processed in a timely manner. Annual Renewal Request Form can be found in the "Resources" section of LAM.

Three Year Entity Reinvestigation

Every three years, the Gaming Entity licensee must undergo, and pay for, a complete reinvestigation. The Commission, however, will reach out to the Gaming Entity when this is set to occur, and with any and all form submission requirements and timelines. This process, along with applications and fees, is completely separate from the annual renewal of the Gaming Entity or Occupational Licenses.

EGD Requirements

The Commission requires specific information about supplies, warehouses, and employees for EGD equipment and shipments. This system is also used for Sports Wagering Vendors ITL (independent testing lab) certifications. If your company does not deal with this, feel free to skip this section. If you are unsure, contact the [Commission's EGDS Compliance Manager](#).

Notification Requirements & EGD System

Gaming Entities are required to furnish the Commission with information that will be entered into the Indiana Electronic Gaming Device System ("EGDS") and used for communication with certain Gaming Entity employees. The Commission requires the information of the Gaming Entity's employees who will receive any approved gaming technology certifications. Additionally, Gaming Entity employees will require access to the EGDS for the purpose of confirming orders submitted by the casinos and marking when orders are in transit.

Warehouse Location Notification

An email notification is required to be sent to the [EGDS Compliance Manager](#) with the location of any warehouse that will be shipping approved gaming product to an Indiana casino. This email needs to include the name of the Gaming Entity and the full address of the before mentioned warehouses.

Approved Gaming Technology Certification or ITL Contact

An email notification is required to be sent to the [EGDS Compliance Manager](#) with the name and email addresses of anyone who will receive the Approved Gaming Technology or ITL Certifications. More than one person and email address can be identified as the point of contact. Any time a change needs to be made to the contact list, please update the Commission's EGDS Compliance Manager.

EGDS User Request – Access Agreement Form

Access to the EGDS is required by the Commission by at least one Gaming Entity employee. The Gaming Entity is required to confirm orders submitted by the casinos and to mark when orders are in transit. To acquire access to the system, an [Access Agreement Form](#) will need to be submitted by each employee who uses the EGDS to the [EGDS Compliance Manager](#). **Be sure the form is signed by the employee and the Compliance Manager of the Gaming Entity.**

EGDS User Guide

The Commission has an [EGDS User Guide](#). Please review it for use of the system, and disseminate it to any employees that use the system.

REPORTS SUBMITTED BY EMAIL TO INDIANA GAMING COMMISSION

	Code Site	Report Name	Frequency
Banned Jackpot Spreadsheet/Safekeeping Log	0	Banned Jackpot Spreadsheet-Safekeeping Log	Monthly
Economic Development Reports	68 IAC 1-3-2	Economic Development Reports	Annual
Emergency Procedures	68 IAC 11-4-5 (b)2	Emergency Procedures	Specific Instance
Emergency Response Training Reporting	68 IAC 8-2-26	Emergency Response Training	Annual
Financial Statement Audits	68 IAC 15-14-3	Financial Statement Audits	Annual
General Reporting Requirements	68 IAC 1-5-1	Casino or Supplier or Applicant Shall provide written notice:	
		1 Violation of Rules of the Commission	as soon as aware
		2 Change in status of Owners License or Suppliers License	as soon as aware
		3 Civil Litigation filed against Casino or Supplier	as soon as aware
		4 Criminal, Civil, Admin Action or Investigations initiated by a government entity	as soon as aware
		5 Claims made by gov entity re Tax liability	as soon as aware
		6 Criminal, Civil, Administrative or tax Action by or against employee or key person	as soon as aware
		7 Bankruptcy, receivership, or debt adjustment	as soon as aware
		8 Compliance Review by IRS	Within 10 days of receiving rpt
		9 Notice Requested by Executive Director	Specific Instance
Internal Audit Procedures	68 IAC 15-8-1 (e)	Internal Audit Reports	Semi-Annual
Internal Control Procedures (QUARTERLY)	68 IAC 11-9-3	Child Support Arrears Delinquency Report	Quarterly
	(b)	List of CSADR Authorized Employees	Quarterly
Notice of Public Offering	68 IAC 4-1-4	Notice of Public Offering	Specific Instance
Personal Protective Measures and Evacuation Procedures	68 IAC 8-2-20	Personal Protective Measures and Evacuation Procedures	Annually
Reporting of Interest in a License	68 IAC 1-13-1 (d)	Reporting of Interest in a License	Quarterly
Reporting Purchases with MBE WBE	68 IAC 3-3-9	MBE-WBE Required Notification	within 30 Days of determination
	IC 4-33-14-5	NON Goods and Services Report	
Reporting Requirements for Publicly Traded Corp.	68 IAC 4-1-7	Reporting requirements for Publicly Traded Corp.	
	a	Notification of SEC filing listed in this rule	within 10 business days
	b	Copy of material document filed with SEC per this rule	within 10 business days
	(c) (1)	List of Recordholders and Benef Owners of voting securities	Annually
	(c) (2)	Election or appointment of director or any officer in this rule	within 10 business days
	(c) (3)	Written notice of disposed voting securities	by the 15th day of mo following trans
Sale or Lease of Equipment, Devices, and Supplies	IC 4-33-7-5	Sale or Lease of Equipment, Devices, and Supplies	Quarterly
Testing and Updating Plan Procedures	68 IAC 8-2-25	Testing and Updating Emergency Response Plan Procedures	Annually