



**INDIANA
GAMING
COMMISSION:
SUPPLIER
WELCOME
PACKET**

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Gaming Administrator, Occupational Licensing Contact Email: OccLic@igc.in.gov

Reporting Email: Reports@igc.in.gov

EGDS Compliance Manager, EGDS Contact Email: EGD-Compliance@igc.in.gov

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 Suppliers, and their employees, must submit their information for licensure.

Certain 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 Suppliers
- Types
 - Temporary (page 7)
 - Permanent (page 8)

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 both are required before these employees can perform duties if a license is required.

Licensure

All licenses require a background check and suitability investigation by the Commission. The licenses must be kept up to date. Supplier licensees must notify the Commission of any changes to name, address, or other personal information with its quarterly reporting. **Notices of license termination are required within 10 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 Supplier.

Level Designation Process

Level 1 and Level 2 application criteria

Suppliers should submit applications for employees according to the following criteria:

I. Occupational license, Level 1, includes the following positions or their equivalent:

1. Chief Executive Officer;
2. Chief Financial Officer/Chief Accounting Officer;
3. Chief Commercial Officer;
4. Chief Operating Officer;
5. Chief Technology Officer;
6. Chairperson/Board Member/Director/Secretary or any combination thereof;
7. Chief Compliance Officer/Director of Compliance;
8. Chief Legal Officer/Director of Legal/General Counsel;
9. Chief Technology Officer/IT Security Officer/Chief Cybersecurity Officer;
10. Key persons, as defined by 68 IAC 1-1-57;
11. Substantial owners, as defined by 68 IAC 1-1-86; and
12. 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:

1. Any employee of a Supplier whose duties meet the requirements for licensure below, and who are not employees described in Section I above; and
2. 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.

A. Access to PII:

1. Access to Indiana patron PII requires an occupational license.¹

B. Indiana casino access:

1. 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;
2. Physical access to sensitive areas in casinos to service equipment;
3. 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
4. Engineers and developers of regulated gaming equipment must obtain an occupational license.

¹ “**Personal Identifying Information (PII)**”: is herein defined as any sensitive information of patrons of Indiana casinos or sportsbooks 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.

C. Server Access:

1. 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.
2. 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.²
3. 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:

1. Accounting/Finance:
 1. Chief Financial Officer, or equivalent top line manager/controller must obtain an occupational license, Level 1.
 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 Sections A-D will require licensure.
2. 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 Sections A-D.
3. 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 Sections A-D.
4. Marketing/social media/promotions:
 1. Licensing required only as it pertains to employees that meet the criteria of Sections A-D.
5. 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 OcclLic@igc.in.gov.

² 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.

Applications

Each License Level has a corresponding application, these help ask the right questions.

Submission

Suppliers 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.

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.

Approvals

When an application has been received, processed, and approved, an email will be sent listing the license number and expiration date of the new temporary license to the Supplier contact. After this has been received by the Supplier, 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 on pages 4-6 of this packet before this time.**

Once the employee has been issued a permanent license, the Supplier contact will be issued a permanent license letter from the Commission via email.

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 Supplier 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. The licensee will receive a letter from the Commission via the Supplier contact to notify them of permanent status of the license and the duty to update their information. Once a permanent license has been issued, the Supplier will incur a charge for the permanent license. The Commission will issue Suppliers 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. [Renewal Forms](#) can only be submitted within 60 days of their expiration date. On the third business day of every month, the Commission will email the Supplier contact a courtesy renewal report. Renewal reports will show the employees who require renewals within the next three months.

If for any reason the renewal listing is not received by the Supplier, the renewals are still required to be received on time.

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

Renewal Submissions require the renewal fee and renewal form to be sent to the Commission. [Renewal fee amounts](#) and [forms](#) can be found on the Commission [website](#). Upon receipt, review, and approval, an email will be sent to the Supplier contact listing the name, license number, and new expiration date of the licensee, confirming the renewal has been completed.

Renewal Forms should not be used to update a licensee's title. Title updates should be included in the company's quarterly filing. If the title on a Renewal Form does not match the licensee's title on record, the renewal will be processed under the title on record and the Supplier contact will be notified of the discrepancy.

Updates and Quarterly Reporting

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

- Title changes for occupational licensees: utilizing Application for Position Change or Replacement Badge form, on the IGC [website](#).
- Occupational licensee changes of name, address, telephone number, and/or the filing of a bankruptcy: utilizing the Occupational Licensee Annual Renewal Information Update form on the IGC [website](#).
- Organizational charts, if changed since last quarterly submission.

Submissions must be made to OcclLic@igc.in.gov on or before the 15th day following the close of each quarter. 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) calendar days of the change or occurrence of the event. The updates that must be submitted within ten (10) days are:

- Occupational licensee updates regarding an arrest, indictment, criminal charge, conviction, or guilty plea to any felony or misdemeanor offense.
- License termination due to separation from the company or no longer meeting the criteria set forth in the Level Designation Process section above.
- Any other information that would affect the occupational licensee's suitability to maintain a license.

Terminations

Suppliers are required to update the Commission within ten (10) days of any terminations of licensees, or any changes to a licensee's position which cause the employee to no longer require a license. Terminations must be sent utilizing the [Separation of Service Form](#), found on the Commission [website](#).

Late notifications of terminations may result in the Commission taking disciplinary action against the Supplier.

Licensee Badge Requirements

All Supplier 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 Supplier 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 Supplier 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.

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

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

Remote Employees

Some Suppliers 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.

Company Licensing Requirements

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

Continual Reporting Requirements

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

- Change in status of the Supplier's License
- Violations of Rules of the Commission
- Civil litigation filed against the Supplier
- 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, Suppliers are also required to do the following:

- Provide notice of a public offering
- If not publically 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 publically 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 supplier 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 Supplier's license is valid for one year from the date the permanent license was issued. The IGC sends a renewal reminder to the Supplier 60 days before the expiration of the company's license. If for any reason the renewal reminder is not received by the Supplier, the renewal is still required to be submitted on time.

In order to prevent the license from expiring, the Supplier must renew its license annually through the following process:

- Submission of the Supplier's Annual Renewal Request [Form](#)
- Payment of the \$7,500 annual renewal 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.

Three Year Entity Reinvestigation

Every three years, the Supplier licensee must undergo, and pay for, a complete reinvestigation. The Commission, however, will reach out to the entity when this is set to occur, and with any and all form submission requirements and timelines.

EGD Requirements

The Commission requires specific information about supplies, warehouses, and employees for EGD equipment and shipments. 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

Suppliers 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 Supplier employees. The Commission requires the information of the Supplier's employees who will receive any approved gaming technology certifications. Additionally, Supplier 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 Supplier and the full address of the before mentioned warehouses.

Approved Gaming Technology Certification 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 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 Supplier employee. The Supplier 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 Supplier.**

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