



OVERVIEW

Each Video Lottery Sales Agent (VLSA) shall submit a proposed internal controls and security plan for video lottery gaming activities at such time as requested by the Ohio Lottery Commission (OLC) Director prior to commencement of video lottery gaming activities.

REFERENCE DOCUMENTS

Ohio Administrative Code [3770:2-6-03](#)
Video Lottery Sales Agent Terms and Conditions
Operating Procedures – Minimum Internal Control Standards

STANDARDS

Security and Surveillance Plans submitted to the OLC for approval must address the following:

CCTV Systems

- Any area where any portion of the operation of video lottery occurs must be under constant CCTV surveillance.
- The CCTV system must be capable of identifying all video lottery activity including players and video lottery screens.
- All CCTV recordings must be held for a minimum of 14 days and be available for review by authorized representatives of the OLC.
- Authorized representatives of the OLC must be given a private area onsite accessible only to the authorized OLC representatives where they will have access to view the CCTV system.

Security Presence

- There must be a visible presence of security at any time video lottery is being conducted to address age control, criminal acts and other floor security concerns.

Access Control

- Access to restricted areas (cage operations, computer facilities, etc.) must be monitored and limited to appropriate staff.
- A credentialing access card system or an access system controlled by security, surveillance or appropriate staff must be used to control access to all areas where VLT operations are conducted.
- A system must be utilized for sensitive key control for VLTs and restricted areas including a system that will log the removal and return of sensitive keys for maintenance, repairs, cashiers cage and count room.

Disaster Planning

- There must be an emergency procedures manual detailing the actions they will take during a major emergency or natural disaster.



Staffing

- A description of all job duties of any employee actively involved in the operation of VLTs must be submitted to the OLC by the licensed VLSA for review.

COMPLIANCE

CCTV Monitoring System

A licensed video lottery sales agent must submit to the Lottery for review and approval, a diagram of the CCTV monitoring system identifying camera placement and the intended view provided by the camera. The CCTV program must include a training component for use of the system by Lottery Security.

Security Policies and Procedures

A licensed VLSA must submit to the OLC, for review and approval, a policies and procedures manual addressing the following:

- Plans to provide a visible presence of security at any time video lottery is being conducted.
- A policy on age verification.
- Interaction with local law enforcement to arrest or remove unruly or intoxicated patrons as well as the investigation of other criminal acts that may take place in the VLT area of the racetrack.
- An emergency procedures manual detailing the actions they will take during a major emergency or natural disaster.
- Procedures for sensitive key control for VLTs and restricted areas including a system that will log the removal and return of sensitive keys for maintenance, repairs, cashiers cage and count room.
- Enforcement for self exclusion/trespass issues.
- Access control levels to all areas where the operation of VLTs is being conducted for all personnel, visitors and guests which includes issuing identification badges

APPROVAL AND VERIFICATION

The written policies and procedures shall be reviewed by the OLC and items of concern will be brought to the attention of the VLSA for correction. The policies and procedures shall be updated as situations dictate, but no less frequently than annually.

CONTACT

Questions regarding the OLC program may be directed to: John.ODonnell@olc.state.oh.us