



SPORTS GAMING OPERATING STANDARDS

SECURITY PLANNING

EFFECTIVE DATE: AUGUST 1, 2022

OVERVIEW

Each Lottery Sports Gaming Proprietor (LSGP) shall submit proposed internal controls, security, and surveillance plans for sports gaming administrative and technical activities at their facilities. This includes both primary and secondary data centers, offices, and warehouses.

The LSGP shall describe the location where data processing, sports gaming wagering devices/equipment storage, and administrative tasks are being performed. It shall also include a description of security and surveillance controls as requested by the Ohio Lottery Commission (the Lottery) prior to commencement of sports gaming activities.

LSGP Security and Surveillance plans and procedures are NOT subject to the public records act under section 149.433 of the Ohio Revised Code.

REFERENCE DOCUMENTS

Ohio Public Record Law and Security Infrastructure Exceptions [ORC 149.433](#)

Ohio Administrative Code [3770:3-5-02](#)

Ohio Administrative Code [3770:3-6-05](#)

STANDARDS AND COMPLIANCE FOR LSGP FACILITIES

Security plans submitted to the Lottery Investigations and Security Department for approval must address the following:

Camera Systems

- Any area in which wagering devices, controlling software, wagering data or hardware are stored or maintained shall be under constant recorded camera coverage. This includes all primary and secondary data centers, office, and warehouse locations.
- The areas shall have controlled access limited to authorized personnel (e.g., credentialed access cards, physical key access with a log, etc.).
- Recorded camera footage must be made readily accessible to the Lottery or law enforcement upon request, when applicable.
- Recorded camera footage must be archived for a period of at least 45 days. All incidents must be marked accordingly and stored indefinitely.

Access Control

- Access to restricted areas must be monitored and limited to appropriate staff.
- A credentialed access card system or an access system controlled by security, surveillance, or appropriate staff must be used to control entry to all restricted areas.
- The LSGP shall describe the following for both LSGP and type C host facilities:
 - Title of who has access to drop and revenue area keys;



SPORTS GAMING OPERATING STANDARDS

SECURITY PLANNING

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- Descriptions of uniforms, vehicles, identification badges, responsibilities, and shift schedules.
- The process for handling the cash, wagering instruments, negotiable instruments, and confidential personal information of patrons.
- Required sign out of sensitive key control access. Access logs for the Kiosks will be maintained for review and audit. Including purpose of entry, time, date and completion status.
- Loss of power event, electronic locks must have adequate backup power, or fail in such a way that the door remains secure while still allowing egress from the area.

Training Equipment and Facility Requirements

- When an LSGP utilizes an area of their facility for training purposes, this area shall not be used for conducting sports gaming activities, including wagering. No live or real wagers may be placed within training mode and no wager may be accepted for purposes of training.
 - Training areas shall have adequate security to protect trade secret and proprietary information of the LSGP.

Disaster Planning

- The LSGP must develop an emergency procedures manual detailing the actions they will take during a major emergency, natural disaster, or other event that interrupts business operations or endangers life/safety of persons.
- LSGP Facilities must have adequate fire suppression systems designed to protect the sports gaming data stored within them.

HOST LOCATION REQUIREMENTS

The LSGP shall place all self-service kiosks at each host location it partners within an area that falls in direct line of site, at all times, of a host employee. In addition to line-of-sight requirement the following shall be implemented:

- LSGP must ensure sports gaming activities at their type C host locations are conducted in person by customers who are at least 21 years of age.
- Signage clearly stating 21 and over to play must be placed in a conspicuous location.
 - The area designated for sports gaming activity shall be clearly defined and age gated within the host location, with access to wagering devices limited to persons over 21.
 - Each LSGP shall ensure that restrictive measures are in place to mitigate and prevent access for underage gambling in host locations they are partnered with.
 - Age verification hardware and software shall be installed and utilized on all self-service equipment no later than July 1, 2023. When clerk operated point of sale terminals are used for cashing, bet placement, etc., age verification through physical ID checks shall be performed by host staff in advance. Proprietors must ensure that staff are properly trained on these protocols.



SPORTS GAMING OPERATING STANDARDS

SECURITY PLANNING

EFFECTIVE DATE: AUGUST 1, 2022

- All suspected tampering or damage of kiosks or any other criminal activities reported to the LSGP, shall be reported to the Lottery.
 - **It is strongly encouraged that each location utilizes a designated area for equipment that is covered by recorded camera coverage or surveillance if applicable.

**Type C hosts should have a clear understanding of the Key and Drop procedures implemented by the LSGP. If third parties are used for the drop, occupational licensing from OCCC may be required. LSGP will ensure that all parties required to hold licensure, are active and in good standing with OCCC.

APPROVAL AND VERIFICATION

The LSGP written policies and procedures shall be reviewed by the Lottery Investigations and Security Deputy Director and items of concern will be brought to the attention of the LSGP for correction. The Lottery Investigations and Security Deputy Director may conduct audits of the security plans and their implementation on a yearly basis or as often as decided. The policies and procedures shall be updated by the LSGP's as situations dictate, but no less frequently than annually.

**LSGP must meet all incident reporting requirements as set forth in the Ohio Revised Code and Ohio Administrative Code for type C proprietors.

**LSGP must comply with required procedures set forth in 3770:3-5-02

INCIDENT REPORTING

LSGP must comply with reporting requirements within 3770:3-6-05

- The immediate reporting shall be delivered personally or by telephone within one (1) hour of discovery of the incident.
- Written notification, within four (4) hours of the delivery to sportsgaming@lottery.ohio.gov with all known details.
- A formal detailed incident report addressed to the Lottery must be received within twenty-four (24) hours of the incident. This may be in draft form due to continued research.
- A final formal incident report with all details listed above, must be provided to the Lottery withing ten (10) business days of the incident resolution.
- The incident report should include, at a minimum, the following: root cause, description of the incident and all resolution details. The following types of events, but not limited to those listed, will require a written report:
 - Lottery Sports Gaming System takeovers;
 - Major communications failures;
 - Emergency software or hardware changes;
 - Security violations;
 - Physical security breach;
 - Wager violations (e.g., suspicious wagers, unauthorized event offerings, etc.);



SPORTS GAMING OPERATING STANDARDS
SECURITY PLANNING
EFFECTIVE DATE: AUGUST 1, 2022

- Any IT breach or other compromising IT risk; or
- Any other incident type required by the director.

CONTACT

Questions may be directed to: sportsgaming@lottery.ohio.gov