



**OPERATING STANDARDS
EMPLOYEE LICENSING
EFFECTIVE DATE: JUNE 6, 2023**

OVERVIEW

The Ohio Lottery Commission (OLC) requires all employees of a Video Lottery Sales Agent (VLSA) reporting to the facility to obtain an appropriate occupational license. The occupational licensing requirement shall extend to subcontractors who are regularly assigned to the VLSA facility. The OLC may also require occupational licenses for remote employees performing specific tasks.

The Director may approve the licensure of VLSA staff upon consideration of the employee's current licensure in an approved jurisdiction. The Video Lottery Sales Agent (VLSA) agrees to be bound by the decision of the Director relating to licensing reciprocity.

A description of all job duties of all employees must be submitted to the OLC by the licensed VLSA for review. The OLC will determine the licensing category based upon the duties submitted.

REFERENCE DOCUMENTS

Ohio Administrative Code [3770:2-2-01\(K\)\(M\)\(O\)](#)
Ohio Revised Code [3770.21](#), [3770.071](#), [.072](#), & [.073](#) , [5747.064](#)
Ohio Lottery Minimum Internal Control Standards
Video Lottery Operating Standards
Video Lottery Sales Agent Terms and Conditions

VLSA OCCUPATIONAL LICENSE CATEGORIES

Key Gaming License – The license required for a VLSA employee who has the authority to develop or administer policy, long-range plans, or to make discretionary decisions regulating gaming operations and managers, supervisors, or other employees responsible for major areas of the property, even if no gaming is conducted in the area.

Gaming License – The license required for a VLSA employee employed in the operation of a facility whose duties primarily involve the maintenance or operation of gaming activity or equipment or who comes in contact with gaming related cash, tokens, credit vouchers, vouchers, or other financial instruments or who performs security and surveillance activities, but who are not key gaming employees.

Non-Gaming License – The license required for any person who works for a video lottery sales agent, whose duties do not involve the maintenance or operation of gaming activity or equipment or who does not come in contact with gaming related cash, tokens, credit vouchers, or other financial instruments or who does not perform security and surveillance activities, and who is not a key gaming employee.



The OLC shall not be restricted by the title of the job performed but shall consider the functions and responsibilities of the employee involved in making its decision.

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License Category Determination – The VLSA shall submit an organizational chart and job descriptions to the OLC for review and approval. The organizational chart shall include all VLSA job categories and positions and delineate the reporting structure. The job descriptions shall identify all assigned duties for all employees involved in the operation of the VLSA’s facility. The OLC will determine the licensing category for each position based upon the information submitted. The OLC is not restricted to the title of the job performed but considers the functions and responsibilities of each position.

Organizational and Staffing Changes - Proposed changes to the approved organizational chart and/or approved job descriptions shall be submitted to the OLC for review and approval prior to implementation. It is the VLSA’s ongoing responsibility to report unexpected staffing changes that impact the VLSA’s organizational reporting structure to the OLC as soon as possible. The OLC will review all organizational and job description changes and determine the license category as described above.

Reciprocity - If an applicant has been licensed by another United States gaming jurisdiction, the state racing commission, or the Ohio Casino Control Commission as a key gaming or gaming employee, or other similar designation in connection with the operation of gaming, the Director may, but is not required to, consider and rely upon any certifications or licenses obtained in connection with an application submitted in determination of licensure.

Proof of licensure required by the Ohio Lottery includes verification of current licensure by the issuing jurisdiction confirmed by Ohio Lottery Security.

The following states have been approved by the Ohio Lottery as acceptable licensing entities and may recognize reciprocity for VLT Gaming Employees who submit proof of current Licensure from the following jurisdictions:

- Ohio Casino Control Commission
- Colorado
- Michigan
- Nevada
- New Jersey
- New York
- Pennsylvania
- West Virginia

OLC will entertain requests for consideration of reciprocity for other jurisdictions.



Requests may be submitted to vlt@lottery.ohio.gov.

VLSA employees seeking approval via reciprocity from the OLC must submit an application and a certified letter of good standing from the jurisdiction where applicant holds a current gaming license.

Off-Site Employees – Personnel assigned to supporting VLSA operations and working outside of the licensed VLSA facility may be required to obtain an occupational license. Certain job functions including, but not limited to, those involving “write” access to gaming or gaming related computer systems shall require an occupational license. The proposed location where VLSA operational tasks will be performed shall be reviewed and approved by the OLC prior to implementation. All off-site personnel supporting VLSA operations and the tasks they perform must comply with all OLC Minimum Internal Control Standards (MICS) and OLC Operating Standards.

CENTRALIZED SERVICES

A VLSA may request to centralize their operations using remote shared services (Centralized Services). Centralized Services may include but are not limited to; Audit (Internal and Revenue), Finance, Information Technology, and Marketing. A Centralized Services department consists of a group of employees who support multiple gaming entities in various jurisdictions. The OLC may allow Centralized Services under an Employee License obtained by a department director or manager who is the authorized lead of the Centralized Services. The Centralized Services authorized lead will assume responsibility and be held accountable for the actions of the employees authorized to perform work in support of the Centralized Services, up to and including, fines, license suspension or revocation.

Prior to implementing Centralized Services, the VLSA shall submit a formal request to the OLC which details the work to be performed by Centralized Services and must address the following standards:

Document and Information Requests – OLC requests for documents or other information from a Centralized Services department shall be responded to in the same manner and time frame as a request for documents and other information located at the licensed VLSA facility. Delays and/or errors in response to requests from the OLC due to the operational structure or the work of Centralized Services staff shall be the sole responsibility of the VLSA and may result in the suspension or revocation of the Centralized Services licensure.

The VLSA shall be responsible for providing OLC access to any electronic document storage systems utilized by a Centralized Services department or provide another method of delivery of unalterable documentation for the purpose of providing evidence of compliance. The VLSA shall make appropriate Centralized Services staff available for scheduled OLC compliance reviews during standard eastern time zone business hours.



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Staffing – A VLSA shall ensure adequate staffing levels are maintained for all tasks required for the delivery of VLT services in the state of Ohio. Any compromise of service levels or decline in customer satisfaction may result in the suspension or revocation of Centralized Services licensure.

Information Technology – Information Technology systems utilized by remote Centralized Services in support of a VLSA’s operations shall adhere to the OLC IT MICS and the requirements outlined in the OLC Cybersecurity Operating Standard.

Internal Audit – The internal audit requirements outlined in the OLC VLSA Compliance Operating Standard shall apply to all applicable Centralized Services departments which support the VLSA’s operations.

Marketing/Promotions – Centralized Services staff may be utilized to adjust player accounts. Any modifications made to points, tier status, promotional credits, or comps shall adhere to all OLC MICS, OLC operating standards, and the VLSA’s standard operating procedures.

COMPLIANCE

The VLSA shall submit Centralized Services Standard Operating Procedures to the OLC for review and approval. The procedures shall address each of the categories identified above and any additional information deemed pertinent by the VLSA.

CONTACT

Questions regarding the OLC licensing program may be directed to:
vlt@lottery.ohio.gov