

205 CMR: MASSACHUSETTS GAMING COMMISSION  
205 CMR 138: UNIFORM STANDARDS OF ACCOUNTING PROCEDURES AND  
INTERNAL CONTROLS

138.15: Internal Control Procedures for Access Badge System and Issuance of Temporary License Credentials, and Restricted Areas

(1) A system of internal controls submitted by a gaming licensee in accordance with 205 CMR 138.02 shall include provisions related to credentials. All key gaming employees, gaming employees, and gaming service employees, while engaged in the performance of their duties on the premises of the gaming establishment, shall visibly display a credential issued by the gaming licensee on his or her person at all times, ~~and have in their possession their commission issued identification~~. The system of internal controls related to credentials shall at a minimum incorporate the following credentialing system:

\*\*\*

~~(2) The commission shall issue an official credential that shall bear the inscription "Massachusetts Gaming Commission", the official seal of the commission, the signature of the chair of the commission or his or her designee, as well as a photograph of the licensee or registrant and specific identification information for the person to whom the credential is issued. The information shall include:~~

- ~~(a) License or registration number;~~
- ~~(b) Name; and~~
- ~~(c) Access code.~~

**(RESERVED)**

(3) The credential format shall be in a shape and legibility that will enhance surveillance capability and visual acuity. **The final design shall be subject to approval by the IEB. The credential shall include, at a minimum:**

- (a) A unique number or code identifying the employee (e.g.- gaming service employee registration number);**
- (b) Employee's name; and**
- (c) Access code letter in accordance with 205 CMR 138.15(1).**

(4) Notwithstanding 205 CMR 138.15(1), the Director of the IEB or his or her designee, may, upon written request by a gaming licensee, and upon a showing of good cause, exempt certain positions, titles, or persons from the requirements of 205 CMR 138.15(1).

(5) Commission employees, agents or contractors or employees of agencies authorized to conduct regulatory or regulatory related activities pursuant to M.G.L. c. 23K at a gaming establishment shall carry their agency credentials on their person at all times while engaged in the performance of their duties. Credentials may not be utilized for unofficial, social, or non-employment related access, purpose, or presence within any gaming establishment.

(6) A temporary credential shall only be issued by the security department if the following criteria are verified:

(a) The employee to whom the credential is to be issued is listed in the gaming licensee's current employee status report;

(b) The employee ~~holds a current license or registration issued~~ is properly licensed or registered in accordance with 205 CMR 134.00: *Licensing and Registration of Employees, Vendors, Junket Enterprises and Representatives, and Labor Organizations*, as applicable;

(c) The employee is authorized by his or her supervisor to possess the specific credential to be working in the designated or restricted area authorized by such credential; and

(d) The employee has not been issued more than 12 temporary credentials within the preceding 12 month period from the issuance of the first temporary credential.

(7) The temporary credentials may be issued to an employee only for a 24 hour period and shall contain the following information:

(a) A prominent space to allow the insertion of the name of the specific employee to whom it is issued;

(b) The date and time of issuance by the security department;

(c) Name and credential number of issuing security officer;

(d) The conspicuous notation that the credential is "VOID AFTER 24 HOURS"; and

(e) A sequential number reflecting the number of temporary credentials issued at that gaming establishment that is to be recorded in both an onsite IEB and security department bound log book or database.

(8) The IEB shall approve the design of the temporary credentials. The gaming licensee's security department shall secure the temporary credentials until needed for issuance in compliance with 205 CMR 138.15(7). The security department shall provide a monthly report to the IEB identifying the number, names, departments and frequency of temporary credentials issued as well as any missing, stolen, destroyed, or replaced credentials. The IEB may require additional information regarding any credential issuance or utilization and the gaming licensee shall provide all such information in a timely fashion.