

205 CMR: MASSACHUSETTS GAMING COMMISSION

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205 CMR 138.00: UNIFORM STANDARDS OF ACCOUNTING PROCEDURES AND INTERNAL CONTROLS

138.26: Keys for Dual Locks; Gaming Licensee-Controlled Keys and Locks; Notice to the IEB and Surveillance Department upon Malfunction and Repair, Maintenance or Replacement

- (1) Any key, locking mechanism or locking system that is required by 205 CMR 138.00 shall be subject to review and approval by the IEB. Such key shall be capable of unlocking the locking device on no more than one type of secure box, compartment or location used or maintained within the gaming establishment.
- (2) A system of internal controls submitted by a gaming licensee in accordance with [205 CMR 138.02](#) shall include a process for obtaining, reproducing, inventorying and identifying each controlled key, locking mechanism, or locking system and setting forth the procedure by which the key, locking mechanism, or locking system shall be controlled. Such internal controls shall, at a minimum, include an enumeration of those incidents which would be considered to compromise the security of any part of the gaming establishment.
- (3) The types of secure boxes, compartments or locations that require a unique key, locking mechanism, or locking system shall include, without limitation, the following:
 - a) Drop boxes;
 - b) Slot drop containers;
 - c) Trolleys to transport drop boxes from gaming tables to a secure location;
 - d) Trolleys or cabinets used to transport or store, respectively, slot cash storage boxes;
 - e) Count room entrance and exit doors;
 - f) Compartments housing slot drop buckets containers;
 - g) Areas in which slot cash storage boxes are located;
 - h) Compartments housing microprocessors or other control units controlling progressive meter(s) for progressive slot machines;
 - i) Locations housing a computer that controls a progressive payout wager system for gaming tables offering a progressive payout wager; and
 - j) Storage cabinets or trolleys for unattached slot drop boxes.
- (4) A system of internal controls submitted by a gaming licensee in accordance with [205 CMR 138.02](#) shall include inventory procedures for any key required to be controlled and maintained by a gaming licensee and for any corresponding locking device including, without limitation, any key and locking device required by 205 CMR 138.00 for a dual control locking system. The key and locking device inventory controls of each gaming licensee shall include, at a minimum, procedures for:
 - a) Maintenance of inventory ledgers by identified, authorized personnel for purposes of documenting:
 1. The requisitioning of keys and locking devices from vendors;

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2. The receipt of blank key stock;
 3. The storage and issuance of keys and locking devices;
 4. Any loss, removal from service, and subsequent replacement of keys and locking devices;
 5. The destruction of keys and locking devices; and
 6. The results of physical inventories.
- b) The storage of duplicate keys and locking devices, including a physical description of any storage location and the identification of authorized personnel in control of such location;
- c) The destruction of keys and locking devices, including documentation detailing in whose presence any destruction shall occur; and
- d) Physical inventories of all keys and locking devices at least once every ~~12~~ 3 months.

The Massachusetts Administrative Code titles are current through Register No. 1459, dated December 24, 2021.

Mass. Regs. Code tit. 205, § 138.26, 205 MA ADC 138.26

REGULATORY AUTHORITY

205 CMR 138.00: M.G.L. c. 23K, §§ 4(28), 5, 25(d), 27 and 28