

**ILLINOIS GAMING BOARD
MINIMUM INTERNAL CONTROL STANDARDS
SECTION B - SENSITIVE KEY CONTROLS**

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General

1. Sensitive keys are those keys that either management or the IGB designates sensitive to the Owner Licensee's operation and therefore require strict control over storage, duplication, custody, issuance and return. Sensitive key procedures may be automated and/or manual.
2. If key rings are used, each key ring and each key on the ring must be individually identified on the key access list maintained at each sensitive key box.
3. The ICS must include the:
 - a. Location of all sensitive key boxes and whether any of the boxes are portable or controlled by dual locks;
 - b. Job titles which have authorized access to the sensitive key box key(s) and how the keys to the sensitive key boxes are issued and controlled;
 - c. Sensitive key name, location, custodian and job titles authorized to sign out each sensitive key; and
 - d. Location and custodian of duplicate sensitive keys.
4. Each sensitive key box must be under surveillance coverage and have a clear, transparent door. Clear transparent doors are not required for duplicate sensitive key boxes.

Automated Key Control Systems

1. Automated key control systems must be approved by the IGB Administrator.
2. If an automated key control system is used, the ICS must include the following:
 - a. A general description of the automated system and its configuration including how access is controlled, e.g. hand reader, fingerprint, retina scan, password or PIN, etc.;
 - b. System capabilities to provide scheduled and on-demand reports for a complete audit trail of all access including the identity of the key box, identity of the employee, identity of the key(s), date and time out, date and time returned, as well as unauthorized attempts to access the key box (for non-biometric key control systems) and all entries, changes or deletions in the system and the employee who did so;
 - c. Procedures to ensure the battery backup or equivalent for the automated key control system must be capable of maintaining accuracy of all information required for 48 hours;
 - d. Job title in charge of any automated key control system;
 - e. Job title(s) authorized to enter, modify and delete which keys/job titles are authorized for access;
 - f. Procedures to ensure there are alarms for overdue keys, open doors, unauthorized attempts to access and any other unusual activities;
 - g. System override procedures, if any;
 - h. Immediate notification of an IGB Docksite Supervisor/Agent in the event the automated key control system is not operational or loses power;
 - i. Procedures to ensure all keys and individuals authorized to access keys in the automated system are the same as the keys and individuals authorized on the key access list and in the individual employee's job description;

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- j. Procedures, if any, for the transfer of data from the key box to the computer monitoring system or a stand alone system; and
 - k. Alternative procedures for obtaining sensitive keys if the automated key control system is not operational or loses power.
3. Automated key control systems must utilize a non-random key return.
 4. If an automated key control system is used, sensitive keys must not be passed on at shift change.

Sensitive Key Procedures

1. Each sensitive key box custodian must be issued a key access list noting authorized job titles that may access each key.
2. Whenever two (2) sensitive keys are required to access a controlled area, the keys must be independently issued to different employees.
3. Sensitive keys which require issuance under security or management escort must be identified as such in the key access list.
4. Physical inventories of sensitive keys must be conducted quarterly to ensure that the physical count and the access list count match. The ICS must identify the employee responsible for conducting the physical inventories of sensitive keys.
5. The ICS must identify which management employee has the authority to make changes, deletions and/or additions to the key access list.

Key Access List

A current key access list must be maintained at each sensitive key box and a copy given to the IGB Docksite Supervisor, which includes:

1. Name of the key and identifying number or characteristic;
2. Location of the key;
3. Custodian of the key;
4. Quantity of the key(s);
5. Job titles authorized to obtain the key and, if applicable, escort requirements and specific limitations; and
6. Custodian of any duplicate keys.

Manual Sensitive Key Log

1. All sensitive keys and duplicate keys issued under a manual system will be issued after proper completion of a manual sensitive key log.

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2. Sensitive keys must be returned to the sensitive key box and signed-in by the same employee they were issued to. If keys must be passed on at shift change, identify these keys and indicate the procedural controls over their transfer.
3. Completed manual sensitive key logs must be forwarded at specified intervals to the accounting department where they will be reviewed and retained.

Broken, Lost or Missing Keys

1. The ICS must identify those sensitive keys which if lost, missing or taken from the premises require immediate changing of the locks.
2. Include procedures for the receipt, replacement and disposition of broken keys.
3. Include procedures to be followed when a sensitive key is lost, missing or taken from the premises.
4. Include procedures for investigating and reporting missing sensitive keys.