Attachment A

Internet Gaming ICS Requirements

**Items at a Minimum That Must Be Included in Internet Gaming ICS:**

**Section 1: Platform Operation**

1. Procedures for responding to a failure of the internet gaming platform (i.e. game, system, communications, or platform malfunction), including procedures for restoring internet gaming. Incident report for each significant platform failure must be filed with the board and contain the date, time, and reason for the failure along with the date and time the system was restored.
2. Detail the location of the internet gaming servers, including any third-party remote location servers, and what controls will be in place to ensure security of the internet gaming servers.
3. Technical security standards (controls), which must address all of the following:
   1. Applicability and Scope.
      1. The technical security standards must apply, at a minimum, to all the following critical components of the internet gaming platform:
         1. Components which record, store, process, share, transmit or retrieve sensitive information (e.g., validation numbers, personal identification number (PIN), individual and authorized participant data).
         2. Components which store results or the current state of an authorized participant’s internet gaming wager.
         3. Points of entry to and exit from the components provided for in subsection (a-c) and other systems which are able to communicate directly with core critical internet gaming platform components.
         4. Communication networks which transmit sensitive information involving internet wagers under the act.
   2. General Requirements.
      1. The technical security standards (controls) must:
         1. Include a provision requiring review when changes occur to the internet gaming platform.
         2. Be approved by the internet gaming operator’s or internet gaming platform provider’s senior management.
         3. Be communicated to all affected employees and relevant external parties.
         4. Undergo review at planned intervals.
         5. Delineate the responsibilities of the internet gaming operator’s staff, the internet gaming platform provider’s staff, and the staff of any third parties for the operation, service, and maintenance of the internet gaming platform and/or its components.
         6. Meet or exceed the standards prescribed in Gaming Laboratories International, LLC Standard GLI-19: Standards for Interactive Gaming Systems, version 3.0.
   3. Internet Gaming Platform Operations and Security.
      1. Internet Gaming Platform Operations and Security. The internet gaming operator or internet gaming platform provider must adopt, implement, and maintain procedures for, at a minimum, the following:
         1. Monitoring the critical components and the transmission of data of the entire internet gaming platform.
         2. Maintenance of all aspects of security of the internet gaming platform to ensure secure and reliable communications.
         3. Defining, monitoring, documenting, reporting, investigating, responding to, and resolving security incidents.
         4. Monitoring and adjusting resource consumption and maintaining a log of the internet gaming platform performance.
         5. Investigating, documenting, and resolving malfunctions.
      2. Physical Location of Servers and Security. The internet gaming platform must be housed in secure locations. Internet gaming operators and their internet gaming platform providers must provide the board with information on the location of all internet gaming platform servers. The secure locations must have sufficient protection from unauthorized access and physical and environmental hazards and be equipped with surveillance and security systems that meet or exceed industry standards.
      3. Internet Gaming Platform Logical Access Controls. The internet gaming platform must be logically secured against unauthorized access.
      4. Internet Gaming Platform User Authorization. The internet gaming platform must be subject to user authorization requirements as required by the board.
      5. Server Programming. The internet gaming platform must be sufficiently secure to prevent any user-initiated programming capabilities on the server that may result in unauthorized modifications to the database.
      6. Verification Procedures. Procedures must be in place for verifying on demand that the critical control program components of the internet gaming platform in the production environment are identical to those approved by the board.
      7. Electronic Document Retention System. The internet gaming operator or internet gaming platform provider must establish procedures that ensure that all reports required under the Lawful Internet Gaming Act (act) and related rules are stored in an electronic document retention system.
      8. Asset Management. All assets that house, process, or communicate sensitive information, including those comprising the operating environment of the internet gaming platform and/or its components, must be accounted for and have a nominated owner or designated management official that is responsible for each asset.
   4. Backup and Recovery.
      1. Data Security. The internet gaming platform must provide a logical means for securing individual and authorized participant data and wagering data, including accounting, reporting, significant event, or other sensitive information, against alteration, tampering, or unauthorized access.
      2. Data Alteration. The alteration of any accounting, reporting, or significant event data relating to internet wagering under the act will not be permitted without supervised access controls. In the event any data is changed, all information required by the board must be documented or logged.
      3. Backup Frequency. Backup scheme implementation relating to information involving internet wagering under the act must occur at least once every day or as otherwise specified by the board.
      4. Storage Medium Backup. Audit logs, internet gaming platform databases, and any other pertinent individual and authorized participant data and wagering data must be stored using reasonable protection methods. The internet gaming platform must be designed to protect the integrity of this data in the event of a failure. Redundant copies of this data must be kept on the internet gaming platform with open support for backups and restoration, so that no single failure of any portion of the internet gaming platform would cause the loss or corruption of such data.
      5. Internet Gaming Platform Failure. The internet gaming platform must have sufficient redundancy and modularity so that if any single component or part of a component fails, the functions of the internet gaming platform and the process of auditing those functions can continue with no critical data loss. When two or more components are linked, the process of all internet gaming operations between the components must not be adversely affected by restart or recovery of either component and upon restart or recovery, the components must immediately synchronize the status of all transactions, data, and configurations with one another.
      6. Accounting and Master Resets. The internet gaming operator or internet gaming platform provider must be able to identify and properly handle the situation where a master reset has occurred on any component which affects internet gaming under the act.
      7. Recovery Requirements. In the event of a catastrophic failure when the internet gaming platform cannot be restarted in any other way, it must be possible to restore the internet gaming platform from the last backup point and fully recover. The contents of that backup must contain critical information as required by the board.
      8. Uninterrupted Power Supply (UPS) Support. All internet gaming platform components must be provided with adequate primary power. Where the server is a stand-alone application, it must have a UPS connected and must have sufficient capacity to permit a methodical shut-down that retains all individual and authorized participant data and wagering data during a power loss. It is acceptable that the internet gaming platform may be a component of a network that is supported by a network-wide UPS provided that the server is included as a device protected by the UPS. There must be a surge protection system in use if not incorporated into the UPS itself.
      9. Business Continuity and Disaster Recovery Plan. A business continuity and disaster recovery plan must be in place to recover internet gaming operations conducted under the act if the internet gaming platform’s production environment is rendered inoperable.
   5. Communications.
      1. Connectivity. Only authorized wagering devices are permitted to establish communications between any internet gaming platform components.
      2. Communication Protocol. Each component of the internet gaming platform must function as indicated by a documented secure communication protocol.
      3. Communication Over Internet/Public Network. Communications between internet gaming platform components must be secure. Individual and authorized participant data, sensitive information, internet wagers, results, financial information, and individual and authorized participant transaction information related to internet gaming conducted under the act must always be encrypted and protected from incomplete transmissions, misrouting, unauthorized message modification, disclosure, duplication, or replay.
      4. Wireless Local Area Network (WLAN) Communications. The use of WLAN communications must adhere to applicable requirements specified for wireless devices and are subject to approval by the board.
      5. Network Security Management. Networks must be logically separated to ensure that there is no network traffic on a network link which cannot be serviced by hosts on that link.
   6. Third Party Service Providers.
      1. Third-Party Service Communications. Where communications related to internet gaming conducted under the act are implemented with third-party service providers, the internet gaming platform must securely communicate with all third-party service providers utilizing encryption and strong authentication, ensure that all login events are recorded to an audit file, and ensure that all communications do not interfere or degrade normal internet gaming platform functions.
      2. Third-Party Services. The roles and responsibilities of each third-party service provider engaged by the internet gaming operator or internet gaming platform provider must be defined and documented in a manner approved by the board. The internet gaming operator or internet gaming platform provider must have policies and procedures in place for managing third-party service providers and monitoring their adherence to relevant security requirements.
   7. Technical Controls.
      1. Domain Name Service (DNS) Requirements. An internet gaming operator or internet gaming platform provider must establish requirements that apply to servers used to resolve DNS queries used in association with the internet gaming platform.
      2. Cryptographic Controls. An internet gaming operator or internet gaming platform provider must establish and implement a policy for the use of cryptographic controls that ensures the protection of information.
      3. Encryption Key Management. The management of encryption keys must follow defined processes established by the internet gaming operator or internet gaming platform provider and approved by the board.
   8. Remote Access and Firewalls.
      1. Remote Access Security. Remote access, if approved by the board, must be performed via a secured method, must have the option to be disabled, may accept only the remote connections permissible by the firewall application and internet gaming platform settings, and must be limited to only the application functions necessary for users to perform their job duties.
      2. Remote Access and Guest Accounts Procedures. Remote access and guest accounts procedures must be established that ensure that remote access is strictly controlled.
      3. Remote Access Activity Log. The remote access application must maintain an activity log which updates automatically and records and maintains all remote access information.
      4. Firewalls. All communications, including remote access, must pass through at least one approved application-level firewall. This includes connections to and from any non-internet gaming platform hosts used by the internet gaming operator or internet gaming platform provider.
      5. Firewall Audit Logs. The firewall application must maintain an audit log and must disable all communications and generate an error if the audit log becomes full. The audit log must contain, at a minimum, all the following information:
         1. All changes to configuration of the firewall.
         2. All successful and unsuccessful connection attempts through the firewall.
         3. The source and destination IP Addresses, Port Numbers, Protocols, and where possible, MAC Addresses.
      6. Firewall Rules Review. The firewall rules must be periodically reviewed by the internet gaming operator or internet gaming platform provider to verify the operating condition of the firewall and the effectiveness of its security configuration and rule sets and must be performed on all the perimeter firewalls and the internal firewalls.
   9. Change Management.
      1. Program Change Control Procedures. Program change control procedures must ensure that only authorized versions of programs are implemented on the production environment.
      2. Software Development Life Cycle. The acquisition and development of new software must follow defined processes established by the internet gaming operator or internet gaming platform provider and subject to review by the board.
      3. Patches. All patches should be tested, as applicable, in a development and test environment configured to match the target production environment before being deployed into production. Permitted exceptions, related procedures, and controls must be fully addressed.
   10. Periodic Security Testing.
       1. Technical Security Testing. Periodic technical security tests on the production environment must be performed quarterly or as required by the board to guarantee that no vulnerabilities putting at risk the security and operation of the internet gaming platform exist.
       2. Vulnerability Assessment. The internet gaming operator or the internet gaming platform provider must conduct vulnerability assessments. The purpose of the vulnerability assessment is to identify vulnerabilities, which could be later exploited during penetration testing by making basic queries relating to services running on the internet gaming platform concerned.
       3. Penetration Testing. The internet gaming operator or the internet gaming platform provider must conduct penetration testing. The purpose of the penetration testing is to exploit any weaknesses uncovered during the vulnerability assessment on any publicly exposed applications or internet gaming platform hosting applications processing, transmitting, and/or storing sensitive information.
       4. Information Security Management System (ISMS) Audit. An audit of the ISMS will be periodically conducted, including all the locations where sensitive information is accessed, processed, transmitted, and/or stored. The ISMS will be reviewed against common information security principles in relation to confidentiality, integrity, and availability.
       5. Cloud Service Audit. An internet gaming operator and its internet gaming platform provider that utilizes a cloud service provider (CSP), if approved by the board, to store, transmit, or process sensitive information must undergo a specific audit as required by the board. The CSP will be reviewed against common information security principles in relation to the provision and use of cloud services, such as ISO/IEC 27017 and ISO/IEC 27018, or equivalent.
4. Procedures addressing the internet gaming platform’s communication standards.
5. Procedures addressing the internet gaming platform’s data logging standards.
6. Description of all integrated third-party platforms.
7. Procedures for geofencing system verifying each authorized participant’s physical location is located within the permitted boundary when placing a wager.
8. User access controls for all internet gaming personnel.
9. Segregation of duties.
10. Automated and manual risk management procedures.
11. Procedures and security standards as to receipt, handling, and storage of internet gaming equipment.

**Section 2: Acceptance of Wagers, Title 31, and Suspicious Behavior**

1. Description of anti-money laundering compliance standards.
2. Description of process for accepting wagers and issuing payouts, plus any additional controls for accepting wagers and issuing payouts in excess of $10,000.
3. Procedures for identifying and reporting fraud and suspicious conduct.
4. Description of process for accepting multiple wagers from one authorized participant in a 24-hour cycle, including process to identify authorize participant structuring of wagers to circumvent recording and reporting requirements.
5. Process for submitting or receiving approval for all types of internet games and wagers available.
6. Procedures for issuance and acceptance of promotional funds for internet gaming.
7. Procedures and appropriate measures implemented to deter, detect and, to the extent possible, to prevent cheating, including collusion, and use of cheating devices, including the use of software programs that make bets according to algorithms.
8. Automated and manual risk management procedures.

**Section 3: Accounting**

1. Procedures and security for the calculation and recording of gross receipts, adjusted gross receipts and winnings.
2. Policies and procedures in connection with the internal audit function of its internet gaming operations.
3. Procedures for reconciling progressive jackpot awards (with a reset amount greater than $5,000) at least once a month and/or prior to a transfer or modification.
4. Procedure for the recording of and reconciliation of internet gaming transactions.
5. Segregation of duties.

**Section 4: Authorized Participants**

1. Procedures for identifying and restricting prohibited persons.
2. Description of process to close out dormant accounts.
3. Description of process for voiding or cancelling wagers and refunding the authorized participant.
4. Procedures for making adjustments to an internet wagering account (including adjustments for $500 or under must be periodically reviewed by supervisory personnel and anything over $500 must be authorized by supervisory personnel), providing a method for an authorized participant to close out an account and how an authorized participant will be refunded after the closure of an account or how funds will be escheated.
5. Methods for securely issuing, modifying, and resetting an authorized participants account password, Personal Identification Number (PIN), or other approved security feature, where applicable. Any method must include notification to the authorized participant following any modification via electronic or regular mail, text message, or other manner approved by the board. Such methods must include, at a minimum, one of the following:
   1. Proof of identity, if in person.
   2. The correct response to two or more challenge questions.
   3. Strong authentication.
6. Procedures for terminating an internet wagering account and the return of any funds remaining in the internet wagering account to the authorized participant or confiscation of funds.
7. Procedures to terminate all accounts of any individual who establishes or seeks to establish multiple active internet wagering accounts, whether directly or by use of another individual as a proxy.
8. Procedures for receiving, investigating, and responding to all authorized participant complaints.
9. Procedures for registration of authorized participants and establishing internet wagering accounts, including a procedure for authenticating the age, identity and physical address of an applicant for an internet wagering account and whether the applicant is prohibited from establishing or maintaining an account under applicable laws or regulations.
10. Procedures for handling authorized participants or other individuals discovered to be using internet wagering accounts in a fraudulent manner, including the following:
11. The maintenance of information about any authorized participant’s activity or other individual’s activity, such that if fraudulent activity is detected, the internet gaming operator or internet gaming platform provider and the board have all of the necessary information to take appropriate action.
12. The suspension of any internet wagering account discovered to be providing fraudulent access to prohibited persons.
13. The treatment of deposits, internet wagers, and wins associated with a prohibited person’s fraudulent use of an account and the confiscation of any winnings and things of value of a prohibited person.
14. Procedures for the logging in and authentication of an authorized participant in order to enable the authorized participant to commence internet gaming and the logging off of the authorized participant when the authorized participant has completed play, including a procedure to automatically log an authorized participant out of the internet wagering account after a specified period of inactivity.
15. Procedures for the crediting and debiting of an internet wagering account.
16. Procedures for withdrawing funds from an internet wagering account by the authorized participant.
17. Procedures for the protection of an authorized participant’s funds, including the segregation of an authorized participant’s funds from operating funds of the internet gaming operator and/or internet gaming platform provider.
18. Procedures and security measures to prevent ACH fraud regarding failed ACH deposits if an authorized participant’s internet wagering account is funded through an ACH transfer.
19. Establishing policies and procedures with respect to credit.

**Section 5: Data Privacy and Security**

1. Procedures for the security and sharing of personal identifiable information of an authorized participant, funds or financial information in an internet wagering account and other information as required by the board. The procedures must include the means by which an internet gaming operator and/or internet gaming platform provider will provide notice to an authorized participant related to the sharing of personal identifiable information.
2. Procedures and security standards to protect and respond to suspected or actual hacking or tampering by an individual with the internet gaming operator’s or internet gaming platform provider’s internet gaming website, internet gaming devices, and associated equipment.
3. Procedures to govern emergencies, including suspected or actual cyber-attacks, hacking, or tampering with the internet gaming platform, internet gaming website, internet gaming devices, and associated equipment. The procedures must include the process for the reconciliation or repayment of an authorized participant's internet wagering account.

**Section 6: Responsible Gaming**

1. Detailed responsible gaming measures.
2. Method for securely implementing and using the information contained in the responsible gaming database.
3. Procedures for establishing and maintaining a self-exclusion list as prescribed in the act, rules, and direction of the executive director.
4. Procedures to prevent wagering by prohibited persons. Including processing winnings or things of value confiscated or withheld from a prohibited person.
5. Procedures for internet gaming operator-imposed or internet gaming platform provider-imposed exclusion of authorized participants, including the following:
   1. Providing a notification containing operator-imposed or internet gaming platform provider-imposed exclusion status and general instructions for resolution.
   2. Ensuring that immediately upon executing the operator-imposed or internet gaming platform provider-imposed exclusion order, no new wagers or deposits are accepted from the authorized participant, until such time as the operator-imposed or internet gaming platform provider-imposed exclusion has been revoked.
   3. Ensuring that the authorized participant is not prevented from withdrawing any or all of his or her account balance, provided that the internet gaming operator or internet gaming platform provider acknowledges that the funds have cleared, and that the reason(s) for exclusion would not prohibit a withdrawal.

**Section 7: Test Accounts**

1. Procedures for test accounts must address the following:
   1. The procedures for the issuance of funds used for testing, including the identification of who is authorized to issue the funds and the maximum amount of funds that may be issued.
   2. The procedures for assigning each test account for use by only one individual. This does not preclude an internet gaming operator from establishing a specific scenario or instance of test account that may be shared by multiple users provided that each user’s activities are separately logged.
   3. The maintenance of a record for all test accounts, to include when they are active, to whom they are issued, and the employer of the individual to whom they are issued.
   4. The procedures for the auditing of testing activity by the internet gaming operator or internet gaming platform provider to ensure the accountability of funds used for testing and proper adjustments to gross receipts.
   5. The procedures for authorizing and auditing out-of-state test activity.

**Section 8: Terms and Conditions**

1. All terms and conditions addressing all aspects of the internet wagering including the following:
   1. Name of the party or parties with whom the individual is entering into a contractual relationship, including any licensee.
   2. Individual's consent to have the internet gaming operator or internet gaming platform provider confirm the individual’s age and identity.
   3. Rules and obligations applicable to the authorized participant including, but not limited to all of the following:
      1. Prohibition from allowing any other individual to access or use his or her internet gaming account.
      2. Prohibition from engaging in internet wagering activity unless physically present in Michigan.
      3. Consent to the monitoring and recording by the internet gaming operator or internet gaming platform provider and/or the board of any internet wagering communications and geographic location information.
      4. Consent to the jurisdiction of the State of Michigan to resolve any disputes arising out of internet wagering.
      5. Prohibition against utilizing automated computerized software or other equivalent mechanism, such as a "bot," to engage in play.
   4. Full explanation of all fees and charges imposed upon an authorized participant related to internet wagering transactions.
   5. Availability of internet wagering account statements detailing the authorized participant’s internet wagering account activity.
   6. Privacy policies, including information access.
   7. Legal age policy, including a statement that it is a criminal offense to allow an individual who is under the age of 21 to participate in internet wagering.
   8. Full explanation of all rules applicable to dormant internet wagering accounts.
   9. Authorized participant’s right to set responsible gaming limits and to self-exclude.
   10. Authorized participant’s right to suspend his or her internet wagering account for a period of no less than 72 hours.
   11. Action that will be taken in the event an authorized participant becomes disconnected from the internet gaming platform during game play.
   12. Notice that a malfunction voids all pays.
   13. Estimated time period for withdrawal of funds from internet wagering account.