



Ohio Lottery Commission
615 W. Superior Avenue
Cleveland, OH 44113
1-800-686-4208

VLT BULLETIN

October 1, 2021

The Ohio Lottery Commission is issuing this bulletin to Video Lottery Sales Agents (VLSA) and licensed technology providers to provide a status on the program and procedures.

Operating Standards and Procedures have been updated and are available on our website in their entirety. The following information highlights those changes.

Operating Standards

Advertising & Promotion – no substantive changes

Facilities & Capital Investments – no substantive changes

Financial Processing – no substantive changes

Minimum Internal Control Standards – [Added language to clarify SOP requirements](#)

Responsible Gaming Program – no substantive changes

Security & Surveillance – no substantive changes

Shipment of Equipment & Software – no substantive changes

Terminal Standards – no substantive changes

Testing Standards – no substantive changes

Tournaments – no substantive changes

VLSA Fines – no substantive changes

Tech Providers Fines – no substantive changes

OLC Minimum Internal Control Standards

Cage and Credit Section – [Updated the Terms and Definitions section](#)

Information Technology Section – [Updated the Terms and Definitions section, MICS #10, 58, 59, and the Note for MICS #58-60](#)

VLT Section - [Updated the Terms and Definitions section and MICS #78](#)

Human Resources

The OLC is providing the following guidance for VLSA Human Resource Departments regarding employment and licensing procedures. The following information highlights those changes.

Employment Screening

Effective Oct 1, 2020, the OLC will institute the following policy regarding VLSA's request to cease criminal background check and/or drug tests for prospective employees.

- The OLC, as the regulating agency of VLSA's as well as VLSA's licensed employees, is authorized under Ohio Administrative Code §3770:2 with conducting background information searches for all varying categories of OLC licensee prior to final approval. VLSA's are advised to do its own due diligence with respect to the employees each VLSA hires and/or allows on its respective grounds. No action should be taken in reliance on the information collected by the OLC with respect to the OLC's licensing decisions. The OLC disclaims all liability in respect to actions taken or not taken based on any or all of the contents of its background investigations to the fullest extent permitted by law.

Licensing Reciprocity

The OLC seeks to continue ways to work with its VLSA partners to ensure not only thoroughness but to also enhance efficiency with respects to licensing VLSA employees. The OLC has been researching adding a streamlined reciprocity process for those VLSA employees licensed in other states for the same or similar roles in Ohio. Correspondingly, the Ohio Legislature has proposed HB 203 which would extend licensing reciprocity to employees who hold a license issued by another state with substantially similar requirements. As HB 203 navigates its way through Ohio's Legislature, the OLC will begin the process of developing its reciprocity application and acceptance procedures, specifically for Key Gaming and Gaming license holders from states the OLC deems to have substantially similar requirements with respect to licensing and will provide a list of those states on our website. If you have any questions or comments before the rollout of reciprocal licensing procedures, please contact Brian Sindelar as listed below.

Underage Employees

A VLSA is permitted to employ individuals under the age of 21 with appropriate controls to prohibit underage gaming. A Key Gaming or Gaming employee license may be issued to anyone 18 or older. A Non-Gaming license may be issued to anyone 16 or older.

<https://codes.ohio.gov/ohio-administrative-code/rule-3770:2-4-02>

Third-Party Contract Employment

A VLSA may choose to contract with a third-party to provide services such as cleaning, security, entertainment, or otherwise. The third-party vendor is not required to be licensed by the OLC but any employee permanently assigned to the facility must obtain an appropriate license. Temporary substitutes may be permitted in non-gaming positions in coordination with the on-site OLC staff. Third-party employees filling gaming positions must hold a valid license.

Cross-Training

A VLSA may choose to cross train employees in multiple functional areas. This cross-training does not eliminate the requirements for dual signatures / independent verification in compliance with MICS / SOP. For purposes of cross-training, the employee trainee shall be the same license designation as the employee trainer.

Out of State Employment

VLSA employees whose primary workplace is offsite / out of state will be required to obtain and maintain appropriate licensure if they actively impact revenues, systems access, and other crucial areas of the VLSA they are employed by in Ohio. The OLC reserves the right to limit the duties which can be performed off-site and/or to require on-site personnel.

Please contact Brian Sindelar at (216) 774-5577 or via email:

brian.sindelar@lottery.ohio.gov if you have any questions or concerns.