

Question	Reference
Is the Title 31 Compliance Program adequate? Are all regulations met?	§1021.210
Are there any other areas of concern noted during the assessment that should be addressed for Title 31 Compliance?	FIN-2010-G003
Is independent compliance testing performed? How often is testing required? Who performs the independent compliance testing? Is the person(s) conducting the testing qualified? Has the Casino taken corrective action on deficiencies identified in the most recent Title 31 testing/audit report?	§1021.210(b)(2)(ii); FIN-2010-G003
Who or what department analyzes the MTL/MIL for after-the-fact aggregation? What is the process?	§1021.210(b)(2)(v); §1021.313
What are the MTL thresholds? How are customer transactions tracked across the casino?	§1021.313; FIN-2007-G005
What are the MIL thresholds? Does the Casino utilize a separate MIL? Do current MILs in use require the recording of all required information?	§1021.410
Has the Casino established and implemented identification standards for all gaming areas that may be required to gather information for Title 31 report requirements? Is a random sample of CTRs tested?	§1010.312
Does the Casino have a back-of-house system capable of tracking "bill in" by customer? Are these reports reviewed for suspicious activity and CTR reporting?	FIN-2007-G005
If the Tribe has multiple Casinos, are tickets redeemable at more than one property? Are procedures in place to identify structured transactions or suspicious activity?	§1010.314; FIN-2009-G004
If the Tribe has multiple Casinos, are chips redeemable at more than one property? Are procedures in place to identify structured transactions or suspicious activity?	§1010.314; FIN-2009-G004
How is suspicious activity reviewed for SAR determination? How many SARs were filed? How many were not? How is non-filing documentation retained?	FIN-2007-G005; FIN-2010-G002
What is the typical customer profile like? What is the percentage of carded play?	FIN-2010-G002
Are OFAC reports compared to customer lists for possible terrorists? When/how does the Casino check the SDN List?	FIN-2010-G002
How many windows and satellite cages does the Casino have? Are they all allowed the same functions?	FIN-2010-G002
Are currency exchanges allowed? Are there limits?	FIN-2010-G002
Are customer deposits, withdrawals, wire transfers, or credit offered? Are controls in place?	FIN-2010-G002
Does the Casino accept travelers checks, cashier checks, or money orders? Are they domestic or foreign?	FIN-2010-G002

Does the Casino accept personal or business checks? Are there limits or verification systems in place?	FIN-2010-G002
Can a customer purchase a Casino check? Are there restrictions?	FIN-2010-G002
Is there a process to verify that chips being redeemed were acquired during gaming play?	FIN-2009-G004
Are associates (not Cage, Table Games, or chip runners) allowed to conduct financial transactions?	FIN-2010-G002
Are transactions allowed through Chip Runners? What are the limits?	FIN-2010-G002
What percentage of time does the Title 31 Compliance Officer devote to Title 31? What is their experience and training schedule?	FIN-2010-G003; FIN-2014-A007
Are Surveillance and Security incident logs reviewed for suspicious activity?	FIN-2007-G005
What is the average number of customers per shift? Is it a high-volume casino?	FIN-2010-G002
Is the Casino located in or near a HIFCA or HIDTA area?	FIN-2010-G002
What is the Casino's geographic location? City center, rural, highway access?	FIN-2010-G002
Does the Casino's gaming revenue indicate excessive cash flow for its size?	FIN-2010-G002
Has the Casino established drop analysis thresholds? How often is drop reviewed?	FIN-2007-G005
Are all appropriate systems utilized to assist in Title 31 compliance?	FIN-2007-G005; FIN-2012-G004
Is the Casino layout optimal for visibility of suspicious activity?	FIN-2010-G002
What types of gaming are offered (slots, table games, poker, etc.)?	FIN-2010-G002
How many kiosks are on the gaming floor? What are the redemption limits?	FIN-2010-G002
What is the maximum bet per spin? Is there a high-limit area?	FIN-2010-G002; FIN-2012-G004
What is the maximum bet per table? Could players potentially "cover" bets?	FIN-2010-G002; FIN-2008-G007
Are all positions trained in Title 31? Is training provided before job duties begin?	§1021.210; FIN-2007-005
How is the Title 31 training provided? Is it adequate?	§1021.210; FIN-2007-005
Does the Casino use third-party vendors? Who trains them?	FIN-2010-G002; FIN-2010-G003
What is the number of personnel on the gaming floor per shift?	FIN-2010-G002
What is the total number of associates?	FIN-2010-G002
How many staff have been employed less than 1 year, 5-9 years, or 10+ years?	FIN-2010-G002
What is the average associate turnover rate by department?	FIN-2010-G002
How many Surveillance cameras are there? Is coverage adequate?	FIN-2010-G002
Has the Compliance Program addressed Cyber-Events and SARs?	FIN-2016-A005
Does the Title 31 Officer collaborate with IT on Cyber-Events?	FIN-2016-A005