



Oregon Racing Commission
P.O. Box 366
Gresham, OR 97030
ORC.info@orc.oregon.gov
971-673-0213 Fax
www.oregon.gov/racing



COMMISSION MEETING AGENDA
Saturday, September 21, 2024
1:30 p.m.

The Oregon Racing Commission will meet at **1:30 pm on Saturday, September 21st, 2024.** The meeting will be held in-person at the Josephine County Fairgrounds, located at 1451 Fairgrounds Rd, Grants Pass, OR 97527, in the Arts & Crafts Building and remotely via Microsoft Teams videoconference. You may join the meeting in-person or by clicking on the link below, or by calling in. Please be aware if you call in, your phone number will appear as your ID.

Topic: Oregon Racing Commission's Regular Commission Meeting
Time: September 21, 2024, 01:30 PM Pacific Time (US and Canada)

Join Meeting: [Teams Link](#)
Meeting ID: 234 844 013 740
Passcode: J9yBxo

If you are unable to access this session through a computer, please dial: 1-503-446-4951
Phone conference ID: 551 534 723#

A request for an interpreter or other accommodation for persons with disabilities should be made at least 48 hours before the meeting to Commission staff at: 503-853-5927 or by email at ORC.info@orc.oregon.gov. This proposed agenda is subject to last-minute changes without prior notice.

AGENDA ITEMS

ROLL CALL:

APPROVALS (need to conduct a vote):

- 1) Meeting Agenda.
- 2) August Minutes.

OLD BUSINESS:

- 3) Director's Report.

- 4) Medication and Safety Committee Report.
 - a) Crop Rule.
 - b) Impact of black-market racing on animal welfare.
 - c) 48-hour NSAIDS.
 - d) Suicide Prevention.
 - e) Other.
- 5) Discussion on changes to the Medication and Safety Charter.

NEW BUSINESS:

- 6) Jockey's Guild Update – Darrell Haire, U.S. Region Manager of the Jockey's Guild.
- 7) Southern Oregon Horse Racing Association (SOHRA) Race Meet (Grants Pass) – Commissioner Fowler.
- 8) Tillamook Race Meet – Chair Doherty.
- 9) Eastern Oregon Livestock (EOLS) Race Meet Report.
- 10) Southern Oregon Horse Racing Association (SOHRA) Race Meet Report.
- 11) Crooked River Roundup (CRRU) Race Meet Report.
- 12) Tillamook County Fair (TCF) Race Meet Report.
- 13) Evaluation of the ORC Commission – Facilitated by Samantha Powell.
- 14) Discussion and possible approval of Customer Services Policy.
- 15) Discussion and possible approval of Communication Policy for Press Releases.
- 16) Review of the Key Performance Measures (KPM's) to be posted.
- 17) Review and possible approval to begin the rule making process:
 - a) 462-160-0120 (4)(7)(8) – Prohibited practices include some language on device use.
- 18) Overview of the ADW Audit and template – Micah Lloyd, Director of Mutuels.

PUBLIC COMMENT:

CONTESTED CASES:

None.

EXECUTIVE SESSION

Pursuant to ORS 192.660(2)(f), for the Commission to consider information or records that are exempt by law from public inspection under ORS 192.345(12).

CONFIRMATION OF NEXT COMMISSION MEETING:

The next commission meeting is scheduled for Thursday, October 17, 2024, at 1:30 P.M. remotely via Microsoft Teams.

ADJOURNMENT:

Movement to adjourn.

At any time during the public session, the Commission may go into executive session to consider information or records exempt from disclosure pursuant to ORS 192.660(2)(f), ORS 192.345(2), OAR 462-220-0070 regarding trade secrets; and/or ORS 192.660(2) (f) and ORS 192.355(9) to consult with counsel concerning written legal advice; and/or ORS 192.660(2)(h) to discuss its legal rights and duties regarding current litigation, or litigation likely to be filed. The Commission may also elect to deliberate on pending contested cases pursuant to ORS 192.690(1). Additional items may be placed on the agenda after the general mailing of the agenda. Calls may be made to the Commission office the week of the meeting to inquire about additions.



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Minutes
Oregon Racing Commission
August 22, 2024

Meeting Detail

The Oregon Racing Commission (ORC) met at 1:30 p.m. Thursday, August 22nd, 2024, remotely via Microsoft Teams videoconference.

Call to Order and Roll Call

Vice Chair Berry called the meeting to order at 1:30 p.m. and Karen Parkman conducted roll call.

In Attendance

Commissioners: Quinn Berry, Scott Beckstead, and Diego Conde.

Staff: Connie Winn, Executive Director; Karen Parkman, Program and Administrative Coordinator; Kelly Routt, Assistant Attorney General (AAG)

Excused

Chair Margaret Doherty and Commissioner Lindsay Fowler

Approvals:

Meeting Agenda

Action: Approval of the revised August meeting agenda.

Moved by: Commissioner Conde

Seconded: Commissioner Beckstead

Vote: Commissioners Berry, Conde, and Beckstead voted AYE, and the motion was carried unanimously (3:0).

Meeting Minutes

Action: Approval of the June meeting minutes.

Moved by: Commissioner Conde

Seconded: Commissioner Beckstead

Vote: Commissioners Berry, Conde, and Beckstead voted AYE, and the motion was carried unanimously (3:0).

OLD BUSINESS:

Executive Director's report

Director Winn read the ORC legislative findings and mission statement. She reported that the Crooked River Roundup (CRRU) and Tillamook County Fair (TCF) race meets have been completed since the last meeting. There were improvements made to the backside at CRRU and an increased handle. There was one accident resulting in a jockey and horse injury. TCF was also successful, with no injuries and record-breaking handles for the track each day. Representatives from all four fair meets will be presenting their official reports at the September meeting.

Director Winn reported that Grants Pass Downs is tentatively scheduled for an inspection by Racing Surfaces Testing Laboratory in Kentucky in April, which inspects all HISA tracks.

Director Winn reported she recently attended the Association of Racing Commissioners International (ARCI) and the Racing and Gambling Conference. She was also able to observe the stewards at Saratoga. She will have several agenda items for the next Medication and Safety committee meeting as a result. She shared key takeaways from each conference including Quarter Horse toe grab model rule, discussion on request from Louisiana, discussion on Racing Certificate Program, HISA discussion on what is being seen in different states, discussion on better confidence, discussion on health of the industry and increased racing in some states, and a discussion on Totalizer companies and impacts of update delays on wagering.

Director Winn congratulated Vice Chair Berry on his new son, born August 6th.

Director Winn reported that Commissioner Conde has submitted his formal resignation to the ORC due to scheduling conflicts and thanked him for his service and commitment to the industry. This will be his final meeting as a commissioner for the ORC. She encouraged industry partners and staff to express their appreciation for his hard work during the public comment period.

Lastly, Director Winn reminded that the September meeting will be held in-person in Grants Pass, and notified the commissioners that Administrative Specialist, Maleah Thom, would be contacting them to arrange travel and lodging.

NEW BUSINESS:

Comments from Commissioner Conde

Commissioner Conde announced that while he is stepping away from the ORC due to other engagements, this is not the end of his involvement in racing in Oregon. He has learned a lot over the years, with many highs and lows. He stated that the ORC has been a family, and like a family you win together and lose together, and both circumstances taught him a lot. He thanked previous ORC director Jack McGrail and current director Connie Winn for all they have done and are doing.

Commissioner Conde stated that he will be available again in the future to help support the industry that he loves.

Crooked River Round-Up (CRRU) Race Meet (Prineville) – Commissioner Berry

Vice Chair Berry congratulated the CRRU on a successful meet with full stands and magnificent horses. He reported that he was impressed with the work of the staff and volunteers involved and thanked Doug Smith and Connie Winn for their leadership. He also thanked his friend Dr. Severin Knudsen DVM for stepping in on short notice to work as the attending veterinarian for the meet. He reported he was moved by the recognition of late jockey, Edwardo Sosa, and the ceremony honoring his life. Vice Chair Berry ended his report by asking all meeting attendees to take a moment of silence in honor of all the athletes whose hearts are poured into horse racing.

Discussion on possible changes to the Medication and Safety Charter.

Director Winn reported that there has been an expressed interest from some of the commissioners to open the Medication and Safety commission to all commissioners. Commissioner Berry commented that he is okay with that idea, but as the chair of that committee he does have concerns about timeliness and organization of topics. Commissioner Conde commented that he thinks it is a great idea, if the meetings can be kept succinct. Director Winn asked AAG, Kelly Routt if the meetings would be considered additional Commission meetings if all commissioners are present. Kelly Routt responded that it would still be a sub-committee meeting, it just happens all commissioners are in attendance. The motion would be to allow all commissioners to be on the committee. If scheduled after a Commission Meeting, that meeting would still be adjourned and the Medication and Safety Committee meeting called to order as its own meeting, or it could take place at a completely different time. Director Winn asked if all voting had to take place during the main commission meeting if all 5 commissioners are present in the committee meeting, and if they could vote on recommendations to bring forward to the regular commission meeting. AAG Kelly Routt responded she would have to investigate voting on recommendations, but all official voting would need to be restricted to official Commission Meetings. Commissioner Berry clarified that the idea is to expand the membership of the committee to the full commission due to the importance of the subject, so they are part of the initial conversations and not just receiving reports after the fact.

Action: Approval to open the Medication and Safety Committee to all ORC commissioners.

Moved by: Commissioner Conde

Seconded: Commissioner Beckstead

Commissioner Beckstead asked if the committee would be abolished and if Medication and Safety could be its own section on the regular Commission Meeting agenda. Ms. Routt responded that some boards may handle topics that way, so it is procedural. Vice Chair Berry added that it would add significant time to the regular meetings. Director Winn

suggested waiting to vote, if that was the decision, to discuss with the absent commissioners. Karen Parkman added that all voted on items must be noticed to the public, so if anything came up in those discussions, they would still have to wait for a later meeting to vote. Director Winn stated that if the committee is abolished then she will put that on the September agenda, or it can stay as it is and voted on today. Vice Chair Berry stated he would like to hear from the industry partners, because topics could be trimmed down and placed in the regular meeting for efficiency, but an independent meeting is nice for long, open conversations. Director Winn asked for industry opinions. Lynelle Smith with the Oregon Thoroughbred Owners and Breeders Association (OTOBA) expressed concerns about stakeholder inclusion as committee members, as during the regular meetings public attendees are restricted to the public comment part of the meeting, so their thoughts and opinions may not be voiced until after important actions are already taken. She asked how information gathering would occur to include everyone in the conversation. Vice Chair Berry stated that since all voting would take place at the meeting following the initial discussions, there would still be time for public comment. However, he recognized there are already 6-8 official members of that committee and adding more will add a lot of time. Director Winn suggested revisiting this during the September Medication and Safety meeting for further discussion.

Commissioner Conde withdrew the motion. He cautioned against any topic or headline stating or could be read as the ORC abolishes the Medication and Safety Committee. That public perception needs to be considered. Vice Chair Berry strongly agreed, adding that safety is so important that this is an increased focus on safety, not a diminishment in any way.

Discussion and possible adoption of the following amended rules:

Director Winn reported that both rules have been discussed and approved for rule making by the Commission. Neither has received public comment, and both need motions to adopt.

A. 462-220-0010 (3) – Defines affiliate.

An affiliate is a company that works under another company and uses their equipment.

B. 462-120-0010 (2) – Defines who must be licensed.

Anyone with account holder information must have an Oregon license.

Action: Approval to adopt the amendments of 462-220-0010 (3) and 462-120-0010(2).

Moved by: Commissioner Beckstead

Seconded: Commissioner Conde

Vote: Commissioners Berry, Conde, and Beckstead voted AYE, and the motion was carried unanimously (3:0).

PUBLIC COMMENT:

None.

CONTESTED CASES:

None.

CONFIRMATION OF NEXT COMMISSION MEETING:

The next commission meeting is scheduled to be held in-person on September 21, 2024, at 1:30 P.M. at the Josephine County Fairgrounds, located at 1451 Fairgrounds Rd, Grants Pass, OR 97527, in the Arts & Crafts Building.

ADJOURNMENT:

There being no further business, the meeting was adjourned at 2:11 p.m.

Action: Adjourn the meeting.

Moved by: Commissioner Conde

Seconded: Commissioner Beckstead

Oregon Racing Commission (ORC) Survey 2024

61

Responses



04:48

Average time to complete

Active

Status

1. What category describes your involvement with the ORC?

 Advanced Deposit Wagering Co...	12
 Trainer	7
 Owner	16
 Track staff	8
 Jockey	0
 ORC Staff	7
 Other government agency	1
 Commissioner	2
 Other	17

2. How would you rate your overall experience with ORC?

4.31

Average Rating

3. How do you rate the helpfulness of the ORC employees? (If not applicable, please go to the next question).

4.47

Average Rating

4. If you have an individual ORC license, how would you rate the service of our licensing department? (If not applicable, please go to the next question).

4.73

Average Rating

5. How do you rate the availability of information on the ORC website? (If not applicable, please go to the next question).

4.33

Average Rating

6. How would you rate the Commissioner's involved in policy-making decisions. (If not applicable, please go to the next question).

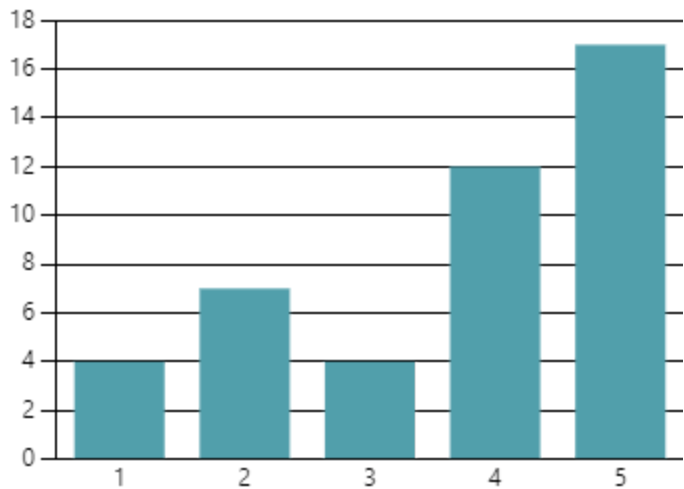
3.70

Average Rating

7. How current and appropriate would you rate the Commission's mission and high-level goals? (If not applicable, please go to the next question).

3.70

Average Rating



8. What can ORC do to improve customer service?

22
Responses

Latest Responses
"Be transparent on all things"

9. What other feedback do you have?

23
Responses

Latest Responses
"things r good"
"One request I have is that when the montly meetings are sent ..."

10. If you would like to be contacted by a representative please provide your contact informaiton below. You may also email us at orc.info@orc.oregon.gov

6
Responses

Latest Responses

Oregon Racing Commission Customer Service Policy

1. Professional Workplace

Respectful Interaction:

- All employees and representatives of the Oregon Racing Commission (ORC) are committed to treating every individual with respect and courtesy. This commitment ensures a positive and professional environment for both internal and external interactions.

Support for Values and Mission:

- Our actions and decisions will consistently reflect the values and mission of the state government and the Oregon Racing Commission. We strive to uphold the integrity and standards of public service in every aspect of our work.

2. Inclusive Customer Access

Universal Communication Preferences:

- The ORC is dedicated to accommodating various communication preferences. We offer multiple channels including phone, email, and in-person consultations, and strive to adapt to any specific needs of our customers.

Establishment of Operating Hours:

- Our minimum operating hours are Monday through Friday, 8:00 AM to 5:00 PM PST. Any changes or exceptions to these hours will be communicated in advance through our website and other relevant channels.

Posting Contact Information:

- Contact information for the ORC, including phone numbers, email addresses, and P.O. Box, will be prominently posted on our website and in all public-facing documents.

Maintaining Accessible Websites:

- Our websites will be designed to be accessible to all users, including those with disabilities. Relevant and current information will be available, ensuring easy navigation and accessibility.

3. Responsiveness

Acknowledgment of Receipt:

- All inquiries will be acknowledged within one business day of receipt. This acknowledgment will confirm that the inquiry has been received and provide an estimated timeframe for a detailed response.

Out-of-Office Replies:

- Employees will use current out-of-office replies when unavailable. These replies will include the expected return date and provide alternative contact information if immediate assistance is required.

Provision of Alternate Contact Information:

- In cases where primary contacts are unavailable, we will provide alternative contact details to ensure that customer needs are addressed without undue delay.

Service Level Goals for Response Times:

- We will establish and publish clear service level goals for response times to inquiries. These goals will be regularly reviewed and updated based on customer feedback and operational efficiency.

4. Customer Service Strategy**Service Level Goals Based on Feedback:**

- Service level goals will be informed by regular customer feedback, ensuring that we align our performance with customer expectations and continuously enhance our service delivery.

Self-Service and Accessible Tools:

- We will provide self-service options and accessible tools on our website, allowing customers to find information and complete transactions independently when possible.

Continuous Improvement Processes:

- The ORC is committed to ongoing improvement of our customer service practices. We will regularly review our processes, gather feedback, and make necessary adjustments to enhance our service quality.

Utilization of Available Technology:

- We will leverage available technology to streamline processes, improve communication, and enhance the overall customer experience.

Planning for Unplanned High-Volume Events:

- To address unplanned high-volume events, such as regulatory changes or emergencies, we will have contingency plans in place to ensure that service levels are maintained and that customers receive timely assistance.

By adhering to this policy, the Oregon Racing Commission aims to provide exceptional service, uphold the highest standards of professionalism, and ensure that all interactions with our customers are respectful, inclusive, and efficient.



Oregon Racing Commission Policy on Releasing Press Releases

Policy Title: Oregon Racing Commission Press Releases

Effective Date: September 1, 2024

Policy Number: ORC-PR-2024-02

Purpose:

The purpose of this policy is to establish guidelines for the Oregon Racing Commission (ORC) regarding the issuance of press releases. The ORC does not have communications staff, so has limited capacity for engaging the media. The press release policy aims to limit press releases to exceptional circumstances, ensuring that any public communication is carefully considered.

Scope:

This policy applies to all ORC staff, commissioners, contractors, and any other individuals involved in the management and dissemination of information related to the ORC.

Policy Statement:

General Policy on Press Releases:

The ORC will generally refrain from issuing press releases.

Exceptional Circumstances:

Press releases may be considered in exceptional circumstances where public interest or safety is significantly impacted, or where misinformation must be corrected.

Such circumstances may include high-profile incidents, or events that attract significant media attention. Routine incidents will be managed internally and communicated to relevant stakeholders without public press releases.

Approval Process:

Any proposed press release must be drafted by the ORC Executive Director or a designated staff member. If a designated staff member does draft the release, the final must be approved by the Executive Director.

Content of Press Releases:

If approved, press releases will include only necessary and verified information, ensuring accuracy and respect for the privacy of all those involved in the incident.

Sensitive details and unverified information will be excluded.

Communication Channels:



Approved press releases will be distributed through the ORC's official website, social media channels, and directly to accredited media outlets.

The Executive Director will handle all media inquiries to ensure consistent and accurate communication.

Review and Updates:

This policy will be reviewed annually and updated as necessary to reflect changes in industry standards, legal requirements, and stakeholder feedback.

Responsibilities:

Executive Director: Responsible for drafting potential press releases and coordinating the approval process.

Compliance:

Failure to comply with this policy may result in disciplinary action, up to and including termination of employment or contracts with the ORC.

Approval:

Connie Winn
Executive Director
Oregon Racing Commission
September 1, 2024

Contact Information:

For any questions regarding this policy, please contact the ORC Communications Department at ORC.info@orc.oregon.gov.

462-160-0120

Prohibited Practices

The following are considered prohibited practices:

(1) The possession or use of a drug, substance, or medication on the premises of a facility under the jurisdiction of the commission that has not been approved by the United States Food and Drug Administration (FDA) for any use in (human or animal) is forbidden without prior permission of the commission or its designee.

(2) The possession and/or use of blood doping agents, including but not limited to those listed below, on the premises of a facility under the jurisdiction of the commission is forbidden:

(a) Erythropoietin;

(b) Darbepoetin;

(c) Oxyglobin®; and

(d) Hemopure®.

(3) The use of Extracorporeal Shock Wave Therapy or Radial Pulse Wave Therapy shall not be permitted unless the following conditions are met:

(a) Any treated horse shall not be permitted to race for a minimum of 30 days following treatment;

(b) The use of Extracorporeal Shock Wave Therapy or Radial Pulse Wave Therapy machines shall be limited to veterinarians licensed to practice by the commission;

(c) Any Extracorporeal Shock Wave Therapy or Radial Pulse Wave Therapy machines on the association grounds must be registered with and approved by the commission or its designee before use; and

(d) All Extracorporeal Shock Wave Therapy or Radial Pulse Wave Therapy treatments must be reported to a commission veterinarian on the prescribed form not later than the time prescribed by the commission veterinarians.

(4) The use of a nasogastric tube (a tube longer than ~~six~~ **18** inches) for the administration of any substance within 24-hours prior to the original post time of the race in which the horse is entered is prohibited without the prior permission of a commission veterinarian.

(5) No medication may be taken into a stall where a horse is stabled unless it is intended for use on that horse.

(6) An animal may not participate in any race if the animal has been administered any drug that is prohibited by the commission less than 24 hours before the original post time for the race in which the horse is entered.

(7) Within 48 hours prior to the start of the published post time for which a horse is scheduled to race, you may not use:

(a) Pulsed electromagnetic field (PEMF)

(b) Lasers;

(c) Nebulizers;

(d) Electro-magnetic blankets;

(e) Whirlpool Boots.

(8) The use of acupuncture within 48 hours prior to the start of a published post time is prohibited.

Statutory/Other Authority: ORS 462.270(3)

Statutes/Other Implemented: ORS 462.270 & 462.415

History:

[RC 8-2024, amend filed 04/08/2024, effective 04/08/2024](#)

RC 2-2009, f. 8-24-09, cert. ef. 10-1-09

RC 2-2008, f. & cert. ef. 9-30-08

RC 1-2008, f. & cert. ef. 4-7-08

RC 6-2007(Temp), f. & cert. ef. 11-28-07 thru 5-23-08

RC 1-2007, f. 2-28-07, cert. ef. 3-7-07

RC 2-2006(Temp), f. & cert. ef. 10-2-06 thru 3-21-07

Does the rule change have a fiscal impact? **No**

Does the rule change require a hearing? **Yes**

What is the reason for the rule change? **Rule change is necessary for the development of the horse racing industry and trends in equine recovery and rehabilitation. Setting the timeframe limitations is to ensure that there is no undue stress or overwork of muscles/tendons on the quine for schedule post and to prevent the breakdown of the equine during races. This also falls in line with other state agencies throughout the United States along with being HISA compliant. This is also in preparation for the**

possible outcome of the Oregon horse racing industry does expand and meets the requirements to simulcast throughout the United States.

States with rules similar to additional rule change request

Kentucky Rules and regulations

810 KAR 8:010. Medication; testing procedures; prohibited practices.

Section 3. Treatment Restrictions.

(7) Electronic therapeutic treatments, other than nebulization, shall not be administered to a horse within twenty-four (24) hours prior to post time of a race in which the horse is entered.

New York Rules and Regulations

Section 4043.13 - Other prohibitions

(a) use or possess any electrical device, "joint," "battery," electric prod, or any other electrical equipment or any mechanical or other appliance not generally accepted as regular racing equipment that can be used to stimulate, depress, goad, spur, retard or condition a horse during a race or during training. The use of ultrasonic, diathermy or other electro/medical equipment is permissible until 24 hours before the scheduled post time of the race in which the horse is to compete, and whirlpool until race time. However, the stewards may bar the possession or use of any specific equipment.



Audit Report

Parent Company

d/b/a: Site.com · Site.com · Site.com

Prepared by:

Micah Lloyd, Director of Mutuels

date

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Overview

The Oregon Racing Commission audits all multi-jurisdictional simulcasting hubs, also known as advance deposit wagering hubs (ADW) at a minimum of twice per year. At least one audit is done on site at the business office, and one is done on site at the Oregon facility where the totalizator and any Oregon-based staff reside. These audits are required and referenced in Oregon Administrative Rule [462-220-0070](#) as well as Oregon Revised Statute [462-725](#).

The audits may cover operations, financials, security, technology, training, and/or other aspects of the operation subject to the Oregon Revised Statutes and Oregon Administrative Rules that govern the licensed ADW.

The conclusions referenced in the “Findings” sections of this report are based upon interviews with company personnel and review of the policies, practices, procedures, and documentary material provided by the company. To protect proprietary systems and information and to maintain the integrity of current practices, certain details have been intentionally omitted from the report.

This document represents the final audit report. The audit commenced during the period of <date>-<date>. The onsite component of this audit was conducted <date> at the ADW located at <address>.

Section 3: Anti-Money Laundering Program

A. Customer Identification Procedure (CIP)

Reference	OAR 462-140-0125 (3)
Testing Standards	<p>Review type of accounts offered.</p> <p>Review method of opening an account.</p> <p>Review type of identifying information available, which must include at minimum: name, address, date of birth and identification number.</p> <p>Determine that the business, for entities other than an individual (such as a corporation, partnership or trust), obtains documents showing the legal existence of the entity, such as certified articles of incorporation, an unexpired government-issued business license, a partnership agreement or a trust instrument.</p>
Documents Reviewed	
Staff Interviewed	•
Findings	

B. AML Compliance Officer Designation and Duties

Reference	OAR 462-140-0125 (3)
Testing Standards	Verify that the ADW, if required to have an AML program, has a designated compliance officer and detailed duties and/or job description for that person.
Documents Reviewed	•
Staff Interviewed	•
Findings	

C. Suspicious Activity Monitoring and Reporting

Reference	OAR 462-140-0125 (3)
Testing Standards	<p>Review processes and procedures for routine monitoring and reporting of suspicious activities.</p> <p>Interview personnel in various positions to assess their knowledge and understanding of suspicious activities monitoring.</p>
Documents Reviewed	•
Staff Interviewed	•
Findings	

Section 4: Customer Accounts

OAR 462-140-0125(3)

A. Approvals and Denials

Reference	OAR 462-140-0125 (3)
Testing Standards	<p>Review applicant approvals and denials to ensure that all approved applicants met the legal age and location requirements, and proper identification was established.</p> <ul style="list-style-type: none"> • Review current self-excluded accounts. • Review self-excluded policies and procedures. • Interview staff and ensure they are aware of policies and procedures. <p>Review list and validate that the account has been closed and no additional wagering has occurred.</p> <p>Review current inactive accounts.</p> <p>Review a minimum of 30 days of deposits and withdrawals.</p> <p>Note: Sample size will depend on the size of the hub, with a higher percentage reviewed for smaller hubs. When possible, 10% of all account holders with a minimum of at least 50 records will be reviewed, unless the ADW has fewer than 50 active account holders. In that case, 100% of records will be reviewed.</p>
Documents Reviewed	<i>See Appendix A: Customer Accounts</i>
Staff Interviewed	<ul style="list-style-type: none"> •
Findings	

B. Application Process

Reference	OAR 462-210-0030(1)(2)(3)(4)(5)(6)(7)(8)(9)
Testing Standards	<p>Review documents used for remote applications and interview staff to assess if appropriate documentation and verification of age, legal name and residency is completed.</p> <p>Ensure identity management processes are in place.</p> <p>Ensure that hubs maintain applicant account-related documents for at least one year and audio recordings for at least three months.</p>
Documents Reviewed	<ul style="list-style-type: none"> •
Staff Interviewed	<ul style="list-style-type: none"> •
Findings	

C. Account Opening Process

Reference	OAR 462-210
Testing Standards	<p>Identify each step in the application process.</p> <p>Ensure that account-opening processes comply with all Oregon Racing Commission rules and statutes.</p>

Documents Reviewed	•
Staff Interviewed	•
Findings	

D. Separation of Duties

Reference	OAR 462-140-0125 (3)
Testing Standards	Interview staff and observe processes to ensure there is clear separation of duties.
Documents Reviewed	•
Staff Interviewed	•
Findings	

E. Identification Management (IdM) Testing

Reference	OAR 462-210-0010(16)(17) OAR 462-210-0030(1)(D)(b) OAR 462-140-0125 (3)
Testing Standards	Ensure that verification system is crosschecking name and, if Social Security account number is used, that proper personal information identifier processes are used (refer to Section 8). Review location identification technology. Determine location of player (Geo IP, Wi-Fi, mobile phone, etc.) during the registration process.
Documents Reviewed	•
Staff Interviewed	•
Findings	

F. Customer Complaints

Reference	OAR 462-220-0070(1)
Testing Standards	Review all customer complaints from the past 30 days and interview senior management. Ensure that all complaints are resolved and documented.
Documents Reviewed	•
Staff Interviewed	•
Findings	

G. Live and Recorded Calls

Reference	OAR 462-210-0040(15)
Testing Standards	Listen to live wagering calls as well as prerecorded calls to assess practices used to prevent fraudulent access to customer accounts. Ensure confidentiality is kept. Listen to a minimum of one hour of calls or a minimum of 25 calls, whichever is greater.

Documents Reviewed	<i>See Appendix B: Customer Interactions</i>
Staff Interviewed	•
Findings	

SAMPLE