



PAWNEE NATION GAMING COMMISSION

Post Office Box 514
Pawnee, Oklahoma 74058
Phone: 918-762-3378
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February 19, 2020

RE: Notice of Proposed Rulemaking

This Letter is public notice of proposed rulemaking that affects the Tribal Internal Control Standards intended to regulate Casino Operations and associated business.

Affected Regulation

PNGC Tribal Internal Control Standards

At a regularly scheduled meeting on Tuesday, February 18, 2020, the Commission recommended approval for the following policy changes:

- Updating Regulations

The most recent revision to these rules occurred sometime in 2017. As outlined in the Ordinance:

ARTICLE 3- TRIBAL GAMING COMMISSION

“SECTION 3.9 STAFFING OF TRIBAL GAMING COMMISSION

- 1) General Counsel. *The Commission shall designate a licensed attorney to act as General Counsel to the Commission.***
- 2) Other Staff. *The Commission may appoint and supervise other staff for the Commission in accordance with the personnel policies and procedures of the Pawnee Nation, at such rates of pay as shall be reflected in the budget of the Commission as approved by the Business Council, provided that no Person may be appointed to the staff of the Commission who is a relative of a member of the Commission, Tribal Manager, Management Contractor, Primary Management Official, Key Employee, or a member of the Pawnee Business Council.***
- 3) Assignment of Other Personnel. *The Commission may request the assignment of personnel to assist the Commission in carrying out its duties under this Ordinance, unless otherwise prohibited by law or contract, and as authorized by the Pawnee Business Council.*”**

The Pawnee Gaming Commission proposes implementing the following:

Proposed Changes

In order to carry out its duties more efficiently and effectively, the Pawnee Nation Gaming Commission will staff a department of employees who will oversee the daily operations of the Tribal Gaming Regulatory Agency required by the National Indian Gaming Commission Minimum Internal Control Standards, and more specifically, the Licensing, Compliance, and Surveillance functions of the casino operations.

1. There will be a department known within the Pawnee Nation of Oklahoma as “Pawnee Nation Gaming Commission”.

a. It’s headquarters and point of contact will be Building 68 on the Pawnee Nation of Oklahoma Main Campus, with an address of 871 Little Dee Drive, Pawnee, Oklahoma 74058. It’s main point of contact telephone number will be (918)762-3378 and a facsimile number will be (918)762-3395.

*b. The department will be fully integrated within the entire Pawnee Nation of Oklahoma, utilizing Pawnee Nation Human Resource Personnel Policies and Procedures, Pawnee Nation Fiscal Policies and Procedures. The Pawnee Nation will supply administrative and technological support to the department in return for ****.** labor cost/burden/indirect costs.*

2. The department will be supervised by a “Director”.

a. The Gaming Commission will be responsible for issuing a job description that is compliant with all of Pawnee Nation HR Policies and Procedures.

b. The Gaming Commission will not be responsible for interviewing or selecting a prospective person for the job. The Gaming Commission will be responsible for determining suitability of Gaming Licensure pursuant to Pawnee Nation Gaming Commission Licensing Standards.

c. In the Absence of a Director, the Gaming Commission may appoint a temporary Director to fulfill the roles and responsibilities of the position until at such time a permanent Director may be appointed.

d. The Director will supervise the daily operations of the entire department, without interference from any Pawnee Nation Government Employee or the Gaming Commission. All Pawnee Nation HR Personnel Policies and Procedures will be utilized in times of evaluation and review of actions taken by the Director.

e. The Director may appoint the following Staff in support of the department’s and Gaming Commissions mission to regulate Gaming Activities as well as associated non-gaming Activities.

i. A Manager responsible for Licensing and related Compliance Issues.

ii. A Manager responsible for Compliance Investigations and Field Work.

iii. A Manager responsible for the daily operations of the Surveillance Activities of all Gaming Activities as well as associated non-gaming Activities.

iv. If Necessary, a manager or custodian of records of the Gaming Commission. This job may be fulfilled by any of the already appointed staff, if the entire workload is sufficiently accomplished.

v. If necessary, any other staff to accomplish the mission of the Pawnee Nation Gaming Commission.

3. The Department will be assisted in legal matters by a Licensed Attorney, known to the Gaming Commission as “General Counsel”.

a. The Gaming Commission will be responsible for determining the type of employment arrangement is necessary to accommodate the workload of this position.

i. This position may be filled by a full-time permanent employee, or, if the Commission elects, another arrangement that may include a contract for services rendered, which may be reviewed and renewed at any period or interval the Commission approves.

Please send your comments to our office at the following address before close of business Monday, March 23, 2020:

Pawnee Nation Gaming Commission
Post Office Box 514
Pawnee, Oklahoma 74058

We will accept electronic correspondence at the following e-Mail address:

aattocknie@pawneenation.org

-Please include “Rulemaking 20-002 Comment” in subject line

Thank you in advance for your time and constructive comments.

Sincerely,

Arthur L. Attocknie
Director

Pawnee Nation Gaming Commission