



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
MICHIGAN GAMING CONTROL BOARD
DETROIT

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TECHNICAL BULLETIN

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Internet Gaming and Internet Sports Betting Release Notes Guidelines 2023

These guidelines apply to internet gaming and internet sports betting conducted pursuant to the Lawful Internet Gaming Act (LIGA), 2019 PA 152, and the Lawful Sports Betting Act (LSBA), 2019 PA 149, respectively, along with all applicable administrative rules promulgated under each act. These guidelines supersede the guidelines issued by the Michigan Gaming Control Board (Board) dated February 8, 2021.

Under administrative rule requirements, any change or modification to an approved internet gaming or internet sports betting platform that impacts a regulated feature thereof, unless otherwise permitted by Board, requires submission to and approval by the Board before implementation. Regulated features include, but are not limited to, platforms and internet gaming or internet sports betting software that are validated using a gaming authentication tool or other method approved by the Board and all critical component software.

Under the administrative rules, the Interactive gaming/event wagering system means the hardware, software, firmware, communications technology, and other equipment that allows an authorized participant to remotely bet or wager through the internet or a similarly distributed networking environment, and the corresponding equipment related to game outcome determination, the display of the game and game outcomes, and other similar information necessary to facilitate play of the game. The internet gaming/sports betting platform provides the authorized participant with the means to play authorized games. The internet gaming/sports betting platform provides the operator with the means to review internet wagering/sports betting accounts, disable games, generate various gaming/financial transaction and account reports, input outcomes for games, and set any configurable parameters. The term does not include computer equipment or communications technology used by an authorized participant to access the interactive gaming/event wagering system. Unless otherwise specified in the rules, the term internet gaming/internet sports betting platform includes the entire interactive gaming/event wagering system inclusive of remote gaming systems used for internet gaming.

Under the administrative rules, each operator and its platform provider must submit change control processes that detail evaluation procedures for all updates and changes to equipment and the platform to the Board for approval. These processes must include details for identifying the criticality of the updates and determining the updates that must be submitted to the Board or a Board-approved independent testing laboratory (ITL) for review and certification.

The purpose of this document is to provide updated guidelines for the release notes submission process for operators and platform providers. Please note that these release note guidelines are reserved strictly for operators and platform providers to directly notify the Board of changes made to their platforms. Internet gaming suppliers (which include game content and/or remote gaming system suppliers) and internet sports betting suppliers that are not platform providers as defined under LIGA and LSBA, may not submit release notes directly to the Board under these release note guidelines.

Internet gaming content and/or remote gaming system suppliers must submit modifications to internet gaming and internet sports betting software, which includes, but are not limited to, changes to the digital signatures (SHA-1 or other digital output digest accepted by the board) of the critical gaming files of individual games, remote gaming systems (RGS), and random number generators (RNG), directly to the Board's gaming laboratory. New products and modifications to previously approved products must be submitted on internet gaming and internet sports betting hardware and software submission forms in accordance with related instructions. Any changes to previously approved products (i.e., internet games, RNG, and RGS), which will cause the digital signature of a critical controlled file to change, must be resubmitted to the Board's Laboratory for approval prior to deployment to a production environment for the Michigan market. These changes must undergo certification testing, by an approved ITL, prior to being submitted to the Board's Laboratory for approval. Critical gaming files for an internet game, RNG, or RGS are those files listed on the ITL's certification letter. The digital signatures for these files must not be altered unless the gaming product has gone through ITL certification testing and been approved by the Board's Laboratory prior to deployment to a production environment.

Third-party suppliers, such as payment processors, know your customer (KYC), geolocation service suppliers, which integrate with an internet gaming and internet sports betting platform, may not submit release notes directly to the Board under these release note guidelines. Operators and platform providers must submit changes made by third party providers to the Board directly after assessing the impact of the change to their platform and determining the appropriate handling for the change under these current release note guidelines.

All release notes must be sent to the Board via email to: MGCB-Igaming-Releasenote@michigan.gov. As provided above, all release note submissions shall be made by an operator or platform provider.

Release notes are required to be submitted for all Level Two (2), Level Three (3), and Emergency changes. Level One (1) changes do not require a release note be submitted to the Board. The operator or platform provider is responsible for determining the level of the submission based on the impact on their platform.

At a minimum, release notes must contain all the following information:

1. Name of the licensed operator or licensed platform provider, as applicable.
2. Date the proposed modification will be installed and the estimated timeframe for completion.
3. The anticipated duration of any expected system downtime.

4. Name, title, and employer of the person(s) who will perform the implementation.
5. The type of release note – Level Two (2), Level Three (3), or Emergency.
6. A description of what is being changed and the reasons for the proposed modification.
7. A list of the components, programs, or versions to be modified or replaced.
8. A description of the impact of the change, including whether the change impacts internet gaming, internet sports betting, or both.
9. A list and attachments of all applicable independent testing laboratory certification letters that support the changes. Please note that all Level Three (3) changes will require independent testing laboratory certification letters unless reasonably explained otherwise at the time of submission. The Board may require independent testing laboratory certification letters for certain Level Two (2) or Emergency changes as deemed necessary.
10. Configurable options or settings that will be affected.
11. The testing method to be used to complete the proposed modification.
12. A list of any critical components (as determined in R 432.639(1)) added, updated, or removed.
13. Procedures to ensure that user and operator manuals are updated to reflect changes to policies and procedures resulting from the proposed modification.
14. Board approval letters on all RGS, RNG, and games where applicable, including modifications to approved software.
15. Attestation that the changes being introduced comply with all laws, rules, and regulations within the State of Michigan.
16. Possible impact on the calculation of adjusted gross internet gaming receipts and/or adjusted gross internet sports betting receipts.
17. A unique release note reference or identification number generated by the submitting entity. Please note this reference number should be unique to each individual release note. If using a date, please modify the reference number to distinguish between multiple submissions.

E-mail Subject Line

The subject of the email must include the following separated by double slashes (//):

1. Type of release note using one of the following:

- | | |
|------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> • Level One (1) ○ <i>No-low impact</i> ○ <i>Not submitted to the Board</i> | <ul style="list-style-type: none"> • Emergency ○ <i>Emergency RN shall identify the level of the emergency release.</i> ○ <i>i.e., Level 2 or Level 3</i> |
| <ul style="list-style-type: none"> • Level Two (2) ○ <i>For low-moderate impact modifications to the platform(s)</i> | <ul style="list-style-type: none"> • Level Three (3) ○ <i>For high impact modifications to the platform(s)</i> |

2. Licensee name submitting the release note:
The following codes must be used (multiple licensees must be separated by a semicolon (;)):

<u>Licensed Operators</u>	<u>Licensed Platform Providers</u>
Bay Mills Indian Community (BM)	DraftKings (DK)
Grand Traverse Band of Ottawa and Chippewa Indians (GTB)	Caesars Digital (CEI)
Greektown Casino (GTC)	Penn Sports Interactive (PSI)
Hannahville Indian Community (HIC)	VHL/888 Holdings (888)
Keweenaw Bay Indian Community (KBIC)	Golden Nugget Online Gaming (GNOG)
Lac Vieux Desert Band of Lake Superior Chippewa Indians (LVDB)	PointsBet (PB)
Little River Band of Ottawa Indians (LRB)	Rush Street Interactive (RSI)
Little Traverse Bay Bands of Odawa Indians (LTBB)	The Stars Group (TSG)
Match-e-be-nash-she-wish Band of Pottawatomis Indians (GLC)	Parx Interactive (PX)
MGM Grand (MGM)	Bet MGM (BMG)
Motorcity Casino (MCC)	FanDuel (FD)
Nottawaseppi Huron Band of the Pottawatomis (FK)	Light and Wonder (LNW)
Pokagon Band of Pottawatomis Indians (FWC)	Pala Interactive (PI)
Saginaw Chippewa Indian Tribe (EC)	GAN (GAN)
Sault Ste. Marie Tribe of Chippewa Indians (SSM)	Wynn (WSI)

3. The licensed internet gaming or internet sports betting operator followed by “Release Note”.

Commonly used abbreviations of the licensed internet gaming or internet sports betting operators are acceptable. If an abbreviation is not included within the list above, please contact the MGCB-IGaming-Releasenote@michigan.gov inbox to assign one.

4. A unique release note reference or identification number generated by the submitting entity.

Example: Level Three (3) // BMG // MGM Release Note // RN #####

Release Notes – Level One (1)

Release notes are not required to be submitted for Level One (1) changes. Level One (1) changes have no impact on the regulated components of the platform.

Level One (1) changes include, but are not limited to, the following:

- Any system configuration changes that have no impact on gaming, revenue calculation, or any regulated feature.

- Changes to web pages or content not related to game play, game outcome, or any regulated feature.
- No impact or low impact change to an existing regulated feature.
- Change to an existing non-regulated feature.
- Adding or removing users.
- Installation or changes made to monitoring software that does not affect Board-implemented system monitoring.
- Emails or mailings to users.
- Whitelisting of IP addresses for the purpose of system testing in accordance LIGA and LSBA administrative rules.
- Changes to the platform for other jurisdictions, which will have no impact on the Michigan platform.
- Background images, color schemes, or similar ancillary front-end client updates.
- Adding, removing, modifying, enabling, or disabling of user or administrative accounts.

Release Notes – Level Two (2)

Release notes must be submitted to the Board for Level Two (2) changes. Level Two (2) changes have a low to moderate impact on the regulated components of the platform. This level of release note allows the operator or platform provider to make changes without explicit approval from the Board. These “notify and do” release notes must be submitted one (1) business day *prior* to the planned change, with the words “Level Two (2)” in the email subject line. The Board reserves the right to adjust the number of days in advance that notice is required if deemed necessary. If these release notes do not include a completion date or the actual completion date is different than what is stated in the release notes, a separate e-mail message must be sent to the Board within one (1) business day of completion stating that the changes have been implemented.

Level Two (2) changes include, but are not limited to, the following:

- Activation of Board approved modifications to a previously Board approved game, remote gaming system, or random number generator system deployed on a platform, on/by a remote gaming server, or on a live game system. =
- Installation of or changes to regulated primary backup data and software.
- Installation of a new Board-approved game on a platform, remote gaming server, or live game system.
- Deploying Board-approved changes to web pages or content related to terms and conditions, authorized participant protection information, or any other feature regulated by the Board.
- Activation or installation of a new non-regulated feature.
- Adding Board-approved games to an already activated and Board-approved platform, remote gaming server, or live game system.
- The deactivation of a Board-approved game.
- Resolving stuck funds using a previously approved process.
- Introduction of novel elements, such as poker tournaments, progressives (including wide area), etc. involving previously Board approved games and software. Note: these novel elements must have been previously submitted to the Board and received Board approval, if necessary, prior to submitting a Level Two (2) release note.

- Back-office modifications.
- Changes to software or hardware that directly reports monitoring information to the Board.
- Installation of operating system security patches.
- Firewall rule changes.
- SSL certificate updates.
- Platform, remote gaming system, or live game system gaming configurations.
- Changes to regulated auditing software.

Release Notes – Level Three (3)

Release notes must be submitted to the Board for Level Three (3) changes. Level Three (3) changes have a high impact on the regulated components of the platform. This level of release note requires prior approval from the Board and must be submitted *at least* five (5) business days *prior* to the proposed date of implementation, with the words “Level Three (3)” in the email subject line. All Level Three (3) changes require ITL testing unless reasonably explained otherwise at the time of the submission. The Board reserves the right to adjust the number of days in advance that notice is required if deemed necessary.

Level Three (3) changes include, but are not limited to, the following:

- Any replacement, removal, or addition of equipment or equipment parts.
- Change of hosting method used for data or servers.
- Database maintenance that modifies or deletes critical data in the database.
- Activation of, updates to, or changes to a regulated feature or related to a regulated feature of the platform as described in the LIGA and LSBA administrative rules and above. As noted above, modifications to an internet game, RNG, or RGS, which will change the digital signature for a critical game, RNG, or RGS file, must always undergo ITL re-certification testing and be submitted to the Board for approval.
- Changes to web pages or content related to terms and conditions, authorized participant protection information, or any other feature regulated by the Board that have not been previously approved by the Board.
- Any configuration changes that impact gaming operations.
- Adoption of or changes in processes related to a regulatory feature.
- Changes to web pages that contain LIGA and LSBA administrative rules related to gaming.
- Installation or activation of a new remote gaming server or live gaming system or a new game that has not yet been approved by the Board.
- A change impacting the handling or storage of personally identifiable information.
- Integration with a new operator or platform provider as a third-party supplier.
- Changes affecting geolocation.
- New processes for the resolution of stuck funds.
- Addition of, removal of, or changes to payment processing, know your customer (KYC), responsible gaming, content delivery network (CDN), or fraud detection.
- Changes to any revenue reports provided to the Board or any data used for financial reconciliations required by under LIGA and LSBA and related administrative rules.

Release Notes – Emergency Release

In emergency situations with open threats or liabilities, operators or platform providers may execute Level Two (2) or Level Three (3) changes immediately without prior notification or approval. Notice shall be provided to the Board as soon as possible and in accordance with the applicable LIGA and LSBA administrative rules.

Emergency release notes shall include a detailed response explaining the necessity for employing the emergency change and all details known at the time concerning the needed update. These emergency changes shall also be submitted to an ITL on the next testing cycle unless provided a reasonable explanation otherwise at the time of submission.

Emergency release notes must be submitted within twenty-four (24) hours of the emergency change to the MGCB-IGaming-Releasenote@michigan.gov inbox. Any submission of an emergency release note also necessitates the filing of an Incident Report which must detail the specifics of the emergency. Emergency release notes must be submitted within twenty-four (24) hours of the change having occurred. Incident reports directly related to an emergency release note shall also be submitted to the MGCB-Igaming@michigan.gov inbox within twenty-four (24) hours of the incident/change.

Please note that games shall not be fixed or modified via emergency release note. The game must be removed from production with the submission of either a Level Two (2) (i.e., “notify and do”) when scheduled, or with an emergency release note if it must be removed immediately.

Change Logs

Each operator or its platform provider must maintain a change management log. The change management log shall be made available to the Board upon request. The change management log shall include a detailed account of all changes made to the platform including all levels of changes (i.e., Level One (1), Level Two (2), Level Three (3), and emergency changes). The change management log is applicable to the entirety of the platform as defined by LIGA and LSBA and related administrative rules, including changes that impact the platform made by integrated game content (remote gaming system) suppliers and third-party suppliers. It is the responsibility of each operator or its platform provider to ensure that all changes made to the platform are logged accordingly. In support of this requirement, each integrated game content (remote gaming system) supplier and third-party supplier should also maintain a separate change management log to support each change made to those components.

Response by the Board

The Board will respond to release notes, as applicable, via email. Please note a business day is based on EST, excluding State of Michigan observed holidays found [here](#).

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