ARC 0751D

PUBLIC SAFETY DEPARTMENT[661]

Notice of Intended Action

Proposing rulemaking related to closed-circuit surveillance systems and providing an opportunity for public comment

The Department of Public Safety hereby proposes to rescind Chapter 141, "Closed Circuit Surveillance Systems," and to adopt a new Chapter 141, "Closed-Circuit Surveillance Systems," Iowa Administrative Code.

Legal Authority for Rulemaking

This rulemaking is proposed under the authority provided in Iowa Code section 99F.4 and Executive Order 10.

State or Federal Law Implemented

This rulemaking implements, in whole or in part, Iowa Code section 99F.4.

Purpose and Summary

Pursuant to Executive Order 10, the Department proposes to rescind Chapter 141 and adopt a new chapter in lieu thereof. The purpose of proposed Chapter 141 is to provide specifications and requirements for closed-circuit surveillance systems in casinos.

A redlined version with tracked changes can be found here.

Regulatory Analysis

A Regulatory Analysis for this rulemaking was published in the Iowa Administrative Bulletin on September 30, 2026. A public hearing was held on the following date(s):

- October 20, 2026

Mary Earnhardt, President and CEO of the Iowa Gaming Association (IGA), attended the hearing. Ms. Earnhardt expressed concern over the increased retention period, use of "IP-based" terminology, surveillance equipment location requirements, staffing requirements, and definition of "catastrophic failure" on behalf of IGA membership. Ms. Earnhardt also submitted written comments on behalf of the IGA.

In response to the IGA's comments, the Department made several changes, including revising the definition of "catastrophic failure" to provide additional clarity, removing the term "IP-based surveillance system" and replacing it with "digital surveillance system," revising language and requirements as they relate to surveillance equipment location, and extending the implementation date for the increased surveillance recording retention period to January 1, 2031.

Fiscal Impact

This rulemaking has no fiscal impact to the State of Iowa.

Jobs Impact

After analysis and review of this rulemaking, no impact on jobs has been found.

Waivers

Any person who believes that the application of the discretionary provisions of this rulemaking would result in hardship or injustice to that person may petition the Department for a waiver of the discretionary provisions, if any, pursuant 7—Chapter 2504.

Public Comment

Any interested person may submit written or oral comments concerning this proposed rulemaking, which must be received by the Department no later than 4:30 p.m. on December 16, 2026. Comments should be directed to:

Josie Wagler
Department of Public Safety
Oran Pape State Office Building
215 East 7th Street
Des Moines, Iowa 50319
Phone: 515.725.6185
Email: wagler@dps.state.ia.us

Public Hearing

Public hearings at which persons may present their views orally or in writing will be held as follows:

December 15, 2026 3 to 3:30 p.m.	First Floor Public Conference Room 125 Oran Pape State Office Building Des Moines, Iowa
December 16, 2026 10 to 10:30 a.m.	First Floor Public Conference Room 125 Oran Pape State Office Building Des Moines, Iowa

Persons who wish to make oral comments at a public hearing may be asked to state their names for the record and to confine their remarks to the subject of this proposed rulemaking.

Any persons who intend to attend a public hearing and have special requirements, such as those related to hearing or mobility impairments, should contact the Department and advise of specific needs.

Review by Administrative Rules Review Committee

The Administrative Rules Review Committee, a bipartisan legislative committee which oversees rulemaking by executive branch agencies, may, on its own motion or on written request by any individual or group, review this rulemaking at its regular monthly meeting or at a special meeting. The Committee's meetings are open to the public, and interested persons may be heard as provided in Iowa Code section 17A.8(6).

The following rulemaking action is proposed:

ITEM 1. Rescind 661—Chapter 141 and adopt the following **new** chapter in lieu thereof:

CHAPTER 141
CLOSED-CIRCUIT SURVEILLANCE SYSTEMS

661—141.1(99F) Definitions. The following definitions apply to this chapter:

"Administrator" means the administrator of the commission.

"Applicant" means any person applying for an occupational license or applying for a license to operate an excursion gambling boat, or the officers and members of the board of directors of a qualified sponsoring organization located in Iowa.

"Casino surveillance" means the observation of gambling activities in a gaming facility licensed by the commission.

"Catastrophic failure" means an event in which the surveillance system becomes inoperable, unresponsive, or unavailable that prevents the operators from effectively monitoring the gaming areas, recording the gaming areas, or both, and a cause and remedy cannot be determined in a reasonable amount of time.

"Closed network" or *"closed circuit"* means all digital recording equipment and all other associated surveillance equipment that shall be designed, configured, and maintained on a separate and exclusive network system located on the same premises as the casino or on property adjacent to the casino that has been approved by the DCI for the location of surveillance equipment pursuant to subrule 141.8(1). This closed network system shall not be touched by, connected to, or partitioned from any other network unless approval has been received from the assistant director for gaming operations of the DCI. Approval or disapproval of such a request by the assistant director is subject to review by the director of investigative operations or the commissioner of public safety.

"Commission" means the Iowa racing and gaming commission.

"DCI" means the division of criminal investigation, Iowa department of public safety.

"Dedicated coverage" means camera coverage where the sole function is to view and record a specific area whenever activity is occurring in that area.

"Designated sports wagering area" means an area, as designated by a licensee and approved by the commission, in which sports wagering is conducted.

"Digital surveillance system" means a unified surveillance infrastructure in which video signals are generated, transmitted, and stored entirely in a digital format. This requires that all individual cameras, transmission media, and recording architectures operate natively in a digital format.

"Gambling activities" means participating in any form of on-site wagering as defined by Iowa Code chapter 99F and approved by the commission; the movement, storage, and handling of uncounted gambling revenues; the manual exchange of moneys for forms of wagering credit on the gaming floor; public entrance into and public egress from the gaming floor, except that egress through emergency exits that are actively alarmed is not included; and any other activities so defined by the commission.

"Gambling game" means any game of chance authorized by the commission.

"Gangplank" means the walkways that passengers use to embark and disembark from the excursion gambling boat.

"Land-based facility" means the licensee's operation where the soft count room is located, if other than on an excursion gambling boat.

"Licensee" means a qualified sponsoring organization conducting gambling games on an excursion gambling boat or in a racetrack enclosure licensed by the Iowa racing and gaming commission under Iowa Code section 99F.7.

"Locked-down mode" means that the gaming facility is closed for an extended period of time due to an exigent event beyond normally scheduled closure. All currency and cheques have been verified and secured if reasonable and circumstances allow.

"Operator" means an entity licensed by the Iowa racing and gaming commission to operate an excursion gambling boat or racetrack enclosure.

"Slot change booth" means a structure on the floor of a licensed gaming establishment that houses a coin-counting device that is utilized to redeem coins or tickets from patrons.

661—141.2(99F) Closed-circuit surveillance system.

141.2(1) Every licensee shall install, maintain and operate, on the same premises where the casino is located or, with the approval of the DCI, on a property adjacent to the casino, a closed-circuit surveillance system, including a digital recording system, according to specifications set forth in these rules and provide to the commission and the DCI access at all times to the system or its signal.

141.2(2) Any casino issued a license on or after July 1, 2004, will be required to install a recording system that is totally digital and that meets the standards outlined in this chapter.

141.2(3) All current licensees shall have in place a completely digital surveillance system by January 1, 2031. For new licensees, surveillance systems must utilize a completely digital surveillance system upon installation. To qualify as completely digital, every individual component of the system—including all video capture devices, transmission media, and recording architectures—must process, transmit, and store data natively in a digital format. The use of analog-to-digital converters, encoders, or hybrid infrastructure to integrate analog components is prohibited after January 1, 2031.

661—141.3(99F) Specified equipment. The closed-circuit surveillance system shall include, at minimum, the following equipment.

141.3(1) *Cameras.* The system shall include pan-tilt-zoom cameras, commonly referred to as PTZ cameras, that are light-sensitive and designed or installed so that the direction of the camera lens is not viewable by the public. Each camera within the system shall have the capability to provide a clear, unobstructed view of the table number of the gaming table or slot machine in color, with the ability to change to black and white. After January 1, 2031, any newly installed cameras that view gaming-related activities and movement or counting of funds must be at a resolution threshold of no lower than 2 megapixels or 1920 x 1080 pixels.

141.3(2) *Date and time generators.* Each system shall be capable of synchronized recording in military time, with both the time and date of the recorded events displayed without obstructing the recorded view.

141.3(3) *Universal power supply.* The system and its equipment must be directly and securely wired in a way to prevent tampering with the system. In the event of a loss in power to the surveillance system, an auxiliary or backup power source must be available and capable of providing uninterrupted power restoration to the elements of the surveillance system that enable surveillance personnel to observe the gaming activity remaining open for play and all areas monitored by dedicated coverage.

141.3(4) *Domes for cameras.* The domes shall be made of sufficient quality and size to accommodate PTZ cameras and shall be capable of accommodating clear, unobstructed views.

141.3(5) *Recorders.* Each camera specified by these standards must possess the capability of having its view displayed on a video or computer monitor and recorded. The surveillance system must include enough monitors and recording capacity to simultaneously display and record multiple gaming, cage, drop, and count room activities and record the views of dedicated coverage. Recording systems shall be capable of copying original images while maintaining the original native format and storing images in a format that contains a method to verify the authenticity of the original recordings and copies. The licensee shall supply the medium for download and transfer of the information.

141.3(6) *Digital systems.*

a. All images and audio shall be digitally recorded and stored on a system with backup and retrieval capabilities.

b. The surveillance system director or manager shall have control and oversight of the digital recording system.

c. All camera coverage and audio in DCI offices and interview rooms are not to be accessed by anyone outside of the DCI without the express permission of the DCI beyond a regular system check.

d. The system shall provide uninterrupted recording while the playback or copy function is used.

e. Areas with coverage shall be recorded at a sufficient rate of images per second so that, when played back in real time, there is no motion loss detectable to the human eye.

f. If the licensee chooses to use a network for the digital recording equipment, it must be a closed network with limited access located on the same premises as the casino or, with the approval of the DCI, on a property adjacent to the casino. Nothing in this paragraph shall be interpreted to prevent the commission from utilizing or transmitting for regulatory purposes images recorded by a video surveillance system.

g. The licensee shall provide the DCI and the commission representative with the necessary software and hardware to review a downloaded recording. Additionally, the licensee shall provide the DCI and the commission representative with printers at their request.

h. The licensee shall be responsible for staffing the surveillance room with licensed staff trained in the use of digital equipment. Surveillance employees shall be capable of downloading or copying digital audio or images, or both, for evidentiary purposes.

661—141.4(99F) Specified surveillance. Every licensee or operator shall conduct and record, as determined by either the commission or the DCI, surveillance that allows clear, unobstructed views of all on-site gambling activities in the following areas of the gaming floor, designated sports wagering area, and related areas, land-based facilities, and racetrack enclosures.

141.4(1) *Slot machines and electronic table games.* Every licensee that exposes these devices for play shall install, maintain, and operate a casino surveillance system capable of monitoring and recording the device number. Dedicated coverage is not required.

141.4(2) *Table games.*

a. The surveillance system must possess the capability to monitor and record all gaming or card table surfaces; table number, including table bank trays with sufficient clarity to permit identification of all chips, cash, card values, and the outcome of the game; dice in craps games with sufficient clarity to read the dice in their stopped position after each roll; and all roulette tables and wheels with sufficient clarity to legibly read and determine the outcome. Each table or card game, with a bankroll, shall have the capability of being monitored and recorded by no less than two cameras. Exceptions include one dedicated camera covering more than one table if the clarity standard can be met.

b. For licensees that offer dealer assisted or semi-automated table games for play shall install, maintain, and operate a casino surveillance system capable of:

(1) Monitoring the dealer terminal and associated controls.

(2) Utilizing dedicated coverage to capture the outcome of each game, as listed in paragraph 141.4(2)*"a,"* to sufficiently detect irregularities, cheating, or collusion between dealers and players.

(3) Recording and retaining the activity in accordance with the established time frame requirements.

141.4(3) *Progressive table games.* Each progressive table game must be monitored by dedicated coverage that provides views of the table surface so that the card values and card suits can be identified and a view of the progressive meter jackpot amount. For linked progressive table meters, at least one linked meter must be covered by dedicated coverage.

141.4(4) *Casino cage, slot change booth, sports wagering counter, sports wagering or ticket redemption center.* The surveillance system must possess the capability to monitor and record a general overview of activities occurring in each casino cage, slot change booth, sports wagering counter, sports wagering or ticket redemption center with sufficient clarity to identify patrons and employees at the counter area, cash drawers, vaults, safes, countertops, coin and currency counting machines, and chip storage and to identify chip, token, and currency denominations. The casino cage, sports wagering counter, and slot change booth area in which fills, credits, sports wagering tickets, and jackpots are transacted must be monitored by dedicated coverage that provides views with sufficient clarity to identify the chip, currency values and the amounts on the fill/credit slips.

141.4(5) *Count rooms.* The surveillance system must possess the capability to monitor and record all areas within the hard or soft count room, including walls, doors, scales, wrapping machines, coin sorters, currency counters, vaults, safes, and general work surfaces, whenever funds or persons are present. The counting surface in the soft count room must be made of a transparent material that maintains its transparency from the view of the camera. Any area where uncounted coin or currency is stored must be monitored by dedicated coverage. In addition, the hard count and soft count process must be monitored by dedicated coverage.

141.4(6) *Movement of funds.* The surveillance system must possess the capability to monitor and record the movement of cash, gaming chips, and drop boxes. All casino and designated sports wagering area entrance and exit doors, elevators, stairs, gangplanks, and loading and unloading areas shall also possess the capability to be monitored and recorded if they are utilized for the movement of uncounted moneys, gaming chips, and redeemable gaming coupons.

141.4(7) *Admissions entrance and exits.* The admissions entrance and exit areas to the gaming floor must be monitored by dedicated coverage with sufficient clarity to identify patrons and employees at the admissions entrance and exit areas.

141.4(8) *Overall views.* The surveillance system must possess the capability to monitor and record the casino pit area and general casino floor with sufficient clarity to permit identification of players, employees, patrons, and spectators.

661—141.5(99F) DCI offices. The following shall be additional mandatory specifications for said room or rooms:

141.5(1) DCI offices shall possess the ability to access surveillance photos via a shared drive or through electronic transmission.

141.5(2) DCI offices shall be provided with equipment allowing audio pickup from soft count rooms that is clear and audible.

141.5(3) All video from interview rooms or detention areas shall be recorded.

141.5(4) All video from DCI interview rooms must be on an independent system that is separate from the main surveillance system or included in the main surveillance system with only the DCI and designated surveillance system manager having access. A system access log shall record any time the surveillance system manager accesses live or recorded video of these areas. If the system is not capable of providing such logs, then a stand-alone solution shall be approved by the DCI. These logs shall be immediately available to the DCI or the commission upon request.

141.5(5) The DCI shall be provided with at least one surveillance workstation consisting of, at minimum, the same monitoring equipment provided at a single work station within the surveillance monitor room unless otherwise approved by the DCI.

661—141.6(99F) Camera lenses. All closed-circuit cameras shall be equipped with lenses of sufficient quality and resolution to clearly show the value of currency, checks, gaming chips, and playing cards.

661—141.7(99F) Lighting. Adequate lighting shall be present in all areas of the casino and count rooms to enable the video surveillance system to provide clear viewing and reproductions.

661—141.8(99F) Surveillance room. There shall be provided in each gambling facility or gambling structure a room specifically utilized to monitor and record gambling activities. The surveillance room shall be staffed with a minimum of two trained surveillance employees at all times while the facility is operating and one trained surveillance employee at all times when the facility is closed, except for brief absences while system coverage is maintained. In addition, licensed gaming facilities may have satellite monitoring equipment. The following are specifications for the operation of equipment in the surveillance room and of satellite monitoring equipment.

141.8(1) *Surveillance equipment location.* All equipment that may be utilized to monitor or record views obtained by a casino surveillance system must remain in a room located on the same premises as the casino or, with the approval of the DCI, on property adjacent to the casino. The satellite monitoring equipment must be capable of being locked or disabled when not in use. The entrance to the casino surveillance room and satellite monitoring equipment room must be secured at all times. The surveillance system server or dedicated surveillance equipment server room shall have one dedicated overview camera. The surveillance system server or dedicated equipment server room will only be accessible by the surveillance department and all additional granted accesses beyond this group must be approved by the DCI and must be logged, excluding exigent circumstances. Surveillance servers in a shared space must be physically separated from other casino operational systems and secured with restricted access.

141.8(2) *Surveillance system personnel.* Personnel assigned to using, maintaining, and supervising of the surveillance system will have clearly defined job descriptions and duties. Personnel shall complete initial and annual operator-developed training and be able to demonstrate competency and proficiency in operation of the surveillance system and knowledge of games and house rules at each property, as documented by the licensee, prior to independent operation of the system. Training records shall be maintained and made available upon request.

141.8(3) *Override capability.* Casino surveillance equipment must have total override capability over any other satellite monitoring equipment in other casino offices, with the exception of the DCI rooms.

141.8(4) *Access.* DCI and commission employees shall at all times be provided immediate access to the casino surveillance room and satellite monitoring equipment. Also, all DCI and commission employees shall have access to all records and areas of such rooms.

141.8(5) *Surveillance logs.* Entries in the log shall be recorded when specific surveillance is requested by the DCI or the commission or whenever any activity that appears unusual, irregular,

illegal or in violation of commission rules is observed. Also, all communications received or sent from the surveillance room in regard to surveillance activities or casino operations shall be logged unless otherwise directed by the DCI.

141.8(6) *Surveillance system network drawings.* A copy of the configuration of the casino floor shall be updated and made available within 72 hours of any approved change after adjustments have been made unless otherwise approved by the DCI. The location of any change and the location of surveillance cameras, gaming tables and slot machines by assigned numbers shall also be included. Copies of the blueprints shall be made available immediately upon completion to the DCI and commission. The DCI or the commission may decide that the blueprints be made available in either physical or electronic format.

141.8(7) *Storage and retrieval.* Surveillance personnel shall label and file all recordings for ease of retrieval. The date and time of the recording shall be recorded. Effective January 1, 2031, recordings of public admission entrances, public exits, ATMs, money exchange kiosks, table games and overviews, casino cashier cages and areas where check-cashing activities occur shall be retained for 30 days unless a longer period is specified by the DCI, the commission, or court order. All other recordings shall be retained for at least seven days after recording unless a longer period is specified by the DCI, the commission, or court order. Original audio, video, and digital recordings shall be released to the DCI or commission upon demand.

141.8(8) *Malfunctions.* Each malfunction of surveillance equipment must be repaired within 24 hours of the malfunction. If, after 24 hours, activity in the affected area cannot be monitored, the game or machine shall be closed until such coverage can be provided. A record of all malfunctions shall be kept and reported to the DCI each day. In the event of a dedicated coverage malfunction, the licensee must immediately provide alternative camera coverage or other security measures that will protect the subject activity. If other security measures are taken, the licensee must immediately notify the DCI. The DCI, in its discretion, will determine whether the other security measures are adequate. In the event of a catastrophic failure of the surveillance system, the DCI must be informed immediately, and a determination will be made as to whether gaming is allowed to continue.

141.8(9) *Security.* Entry to the surveillance room and access to satellite monitoring equipment shall be limited to persons approved by the DCI or the commission. A log of personnel entering and exiting the surveillance room and accessing satellite monitoring equipment shall be maintained and submitted to the DCI or the commission upon request.

141.8(10) *Additional specifications.*

a. Audio and video or digital monitoring and recording shall be continuous in the detention areas when someone is being detained. These recordings must be retained for 30 days after the recorded event, unless directed otherwise by the administrator, DCI or court order.

b. The commission, its employees, and DCI agents shall, at all times, be provided immediate access to the surveillance room and all areas of the casino.

141.8(11) *Written plans and alterations.*

a. Every operator or applicant for licensing shall submit to the commission for approval by the administrator and to the DCI for approval a written casino surveillance system plan no later than 60 days prior to the start of gaming operations.

b. A written casino surveillance system plan must include a casino floor plan that shows the placement of the surveillance room and all casino surveillance equipment in relation to the locations specified for coverage and a detailed description of the casino surveillance system and its equipment. In addition, the plan may include other information that evidences compliance with these rules by the licensee, operator or applicant.

c. The operator may submit a written request to the DCI to change the location of the surveillance room, table games, slot machines, and other gaming devices. The surveillance system must also be adjusted, if necessary, to provide the coverage specified by these rules. A DCI agent must approve the change in the surveillance system before the relocated surveillance room, table games, slot machines, or other gaming devices may be placed into operation. Formal documentation depicting DCI approval of any changes will be submitted to the DCI and the commission upon completion and approval.

EXCEPTION: A commission representative may allow a gambling game to be placed in operation pending approval by a DCI agent.

661—141.9(99F) Nongambling hours. Surveillance will be maintained during nongambling hours as follows.

141.9(1) *Movement of funds.* At any time that cleanup operations or money removal is being conducted in the casino area, the surveillance room must be staffed pursuant to rule 661—141.8(99F).

141.9(2) *Locked-down mode.* Any time the casino is closed and in a locked-down mode, sufficient surveillance coverage must be conducted to monitor and record the casino in general so that security integrity is maintained. During this period, the presence of a trained surveillance employee shall not be required.

661—141.10(99F) Annual review.

141.10(1) *Surveillance system review.* Each licensee shall be subject to an annual surveillance system inspection by the DCI. The review will include:

a. An overall review of the surveillance system and the surveillance system's abilities with the head of surveillance.

b. Verification of required coverages.

c. Image quality testing.

d. System retention abilities.

e. System redundancy and power protection testing.

f. Review of event and system update/upgrade logs and access logs.

141.10(2) *Inspection report.* The licensee shall be provided with a copy of the signed inspection. Any deficiencies or areas for improvement shall be corrected within the timelines agreed upon by the licensee, the commission, and the DCI.

661—141.11(99F) Waivers from requirements. Written requests for waivers of these rules may be filed pursuant to 7—Chapter 2504.

These rules are intended to implement Iowa Code section 99F.4.