



# Review of Charitable Bingo Operations Division Education Program



March 22, 2018  
Report #18-002

Prepared by:



*This report provides management with information about the condition of risks and internal controls at a specific point in time. Future changes in environmental factors and actions by personnel will impact these risks and internal controls in ways that this report cannot anticipate.*



## Introduction

McConnell & Jones LLP (MJ) serving as the outsourced internal audit function (Internal Audit) for the Texas Lottery Commission (TLC) performed a consulting and advisory services assessment of Charitable Bingo Operations Division (CBOD) Education Program. This consulting and advisory services assessment was completed at the request of CBOD's director to help identify best practices for administering their education and training program's content and service delivery methods. The consulting and advisory services were conducted in conformance with the International Standards for the Professional Practice of Internal Auditing (IIA Standards) and with the Texas Internal Auditing Act (The Act).

The IIA standards allow internal auditors to provide consulting and advisory services when the engagement has the potential to improve management of risks, add value, improve the organization's operations; provided that internal audit has no conflict of interest and internal audit personnel have no management responsibilities for the area in scope. When providing advisory or consulting services, internal auditors are required to establish an understanding with consulting engagement clients about objectives, scope, respective responsibilities, and other client expectations. Additionally, the established scope must be sufficient to achieve the objectives of the engagement and must include consideration of relevant systems, records, personnel, and physical properties, including those under the control of third parties.

The Act defines internal auditing as an independent, objective assurance and consulting activity designed to add value and improve an organization's operations. Sec. 2102.003 of the Act defines consulting services as advisory and related client service activities, the nature and scope of which are agreed upon with the client and are intended to add value and improve an organization's operations. Consulting services include counsel, advice, facilitation, and training.

### Objectives and Scope

This consulting and advisory objectives were to assess management controls, processes and tools in place to ensure the following business objectives are met:

- ✓ Provide education and training for individuals to meet the Bingo Enabling Act and Administrative Rule requirements.
- ✓ Educate licensees and charities on how to complete and submit required forms and records.
- ✓ Educate licensees and charities on best practices for managing their bingo programs.
- ✓ Provide innovative education and training in a manner that is cost effective and convenient for everybody.

The scope included identifying the current processes in place and tools available to determine:

- ✓ Education Needs



- ✓ Education Program Topics
- ✓ Education Resources Available to Stakeholders
- ✓ Education Content Delivery Methods
- ✓ Education Requirements
- ✓ Education Program Monitoring Process
- ✓ Education Program Metrics

## Assessment Procedures

We performed the following activities for this consulting and advisory services review:

- ✓ Gained an understanding of the bingo Education and Development Services (E&DS) function's processes from help desk inquiries to the Bingo Service Portal capabilities and current training content.
- ✓ Reviewed internal CBOD training and education related policies and procedures.
- ✓ Mapped the Bingo Enabling Act and Administrative Rule requirements to the current training content provided; Bingo Pre-Licensing Interview and Bingo Chairperson Training.
- ✓ Observed a recent training event held in Austin, TX and San Antonio, TX.
- ✓ Reviewed the volume of Bingo Service Portal (BSP) usage.
- ✓ Researched best practices for training content structure.
- ✓ Researched learning styles related to current bingo chairperson demographics.
- ✓ Reviewed CBOD E&DS staff's job descriptions to ensure that the role is adequately defined.
- ✓ Evaluated the current Moodle training system and its capabilities against similar systems on the market.

## Results and Conclusions

CBOD has made efforts to overhaul and improve their education and training programs. To this effect, the CBOD director restructured the organization in 2016 to have a dedicated E&DS function that is staffed with a coordinator and a specialist. This function is tasked with reviewing and updating all education and training materials and developing new training content. One initiative that was recently completed is that the E&DS staff began facilitating a series of in-person training sessions that are held at various locations throughout the state.

Creating the E&DS function is an important action towards accomplishing the goal of educating bingo stakeholders and licensees to ensure awareness of, and compliance with, regulations.



We concur the CBOD director that there is a need to revamp the current education and training program. The E&DS should be the front-line of bingo awareness, knowledge and resource for all bingo community stakeholders. There are opportunities to improve the overall content and dissemination of the training program so that it is more relevant and innovative. These include the following which are discussed in the opportunities and recommendations section of this report.

*Opportunity #1 – Education and Training Materials*

- 1) Update all training and education materials content to reflect current regulations and statutes. This is essential to the success of the education program.
- 2) Establish a training materials review committee that is comprised of one individual from each CBOD function and is facilitated by the Training and Education coordinator.
- 3) Develop detailed written procedures for tracking, review and updates of all training and education materials.
- 4) Post a summary of legislative changes to the website after each legislative session.

*Opportunity #2 – Education and Training Delivery Methods*

- 1) Redesign the training and education materials to reflect the audience and learning styles.
  - a. The bingo chairperson training should be a series of pre-recorded webinars or computer-based sessions with each webinar or computer-based session focused on a specific topic. Each webinar or computer-based session should be no longer than 30 minutes long and include videos, interactive questions and examples of operations or forms. The chairperson would need to complete each webinar or computer-based session in order to receive the certificate of completion.
  - b. In-person training should be enhanced to include videos, case studies and interactive exercises. The training should be segmented so that the participants can attend specific sections.
- 2) Develop optional training for bingo workers. This can be in the form of a quick YouTube video of a bingo hall and bingo workers in action with a discussion of the “to-do” and “not to-do”.
- 3) Mandatory training should be developed for bookkeepers. This should be a series of webinars or computer-based sessions that includes videos, interactive questions and examples of required forms.
- 4) All training should be updated and refreshed at least once every two years and when rules or requirements change.
- 5) Regular webinars or computer-based sessions should be established to discuss hot topics and bingo operations. Ideally, these would be a live computer-based session that is held on a monthly basis and last no longer than 30 minutes. The computer-based sessions should be promoted and participation should be tracked to determine if this format is being accepted by the bingo stakeholders. The computer-based sessions should also be recorded and made available on the web site.



*Opportunity #3 – CBOD Website*

- 1) Contract with a professional web developer to redesign the CBOD website. The website’s homepage should be designed in a manner that the content is organized according to the respective user’s purpose for visiting the website.

*Opportunity #4 - Education and Training Function Staffing*

- 1) During the time of our fieldwork there was an additional position added to CBOD organization. We recommend that the Education and Development Services function report directly to this position.
- 2) Reiterate the expectations, duties, roles and responsibilities with each E&DS staff person to ensure that each individual is clear on their role in the success of the Commission’s objectives.
- 3) Hold the E&DS function staff accountable for developing the robust education and training program and updating content according to project plans established. In observation #1.
- 4) Task the training materials review committee with ensuring that updated materials are provided to the E&DS function in a timely manner.
- 5) Establish an education and training component whereby CBOD’s auditors in Austin and the regional offices provide training to bingo organizations on the required recordkeeping. This should be available as a one-on-one session when requested, regularly scheduled group sessions and computer-based sessions. The education and training should focus on explaining the required records that must be maintained, showing how the record’s information is placed on the respective required forms and explaining the audit process. This training would not impact the auditor’s independence because (1) the auditor is not making management decision or assuming management responsibilities, and (2) the auditor is not preparing the records or completing the required forms for submission.

*Opportunity #5 – Education and Training Procedures*

- 1) Develop detailed guidelines for the education and training program that describes the goals, responsibilities and expectations for the program. These should include performance metrics that staff should be capturing and reporting on. For example, the number of education and training materials reviewed, the number of education and training materials updated, the number of new education and training materials created, the number of individuals taking each training, the average number of hours required to complete each review, the average number of hours required to develop new education and training materials, etc.
- 2) Revise procedure CB-SP-003, Bingo Training Program Management to be more detailed regarding the steps required for outlining, updating, testing and launching all training materials.
- 3) Develop a detailed checklist for the E&DS staff to use when creating, reviewing or updating training materials. Require the checklist to be completed for all training material creation, review and updates.

*Opportunity #6 – Training Content Updates*

- 1) Create an outline of imperative information for the bingo chairperson training modules to serve as the framework for revising the training.



- 2) Although not required by statute, create an outline of imperative information for other bingo operations roles involving the administration of bingo at the hall level such as workers, bookkeepers and organizations in general. Use this outline as the basis for new training materials.
- 3) Develop and retain detailed outlines of training materials that reference specific regulations and statutes. This outline would serve as a checklist going forward for reviewing training content after each legislative session convenes.

#### *Opportunity #7 - Training Platform*

- 1) Transition away from the MOODLE platform to the agency's YouTube Channel.
- 2) Work with TLC's Information Resources Department and Media Department to understand and use the agency's YouTube Channel for the training platform.
- 3) Require the E&DS staff to become proficient with all training tools and methods including PowerPoint, YouTube, video, webinar applications and other computer-based applications. Prepare a professional development plan for the E&DS staff that includes attending presentation and computer-based training sessions and conferences.
- 4) Place all YouTube procedures and training materials on CBOD's network drive for knowledge transfer purposes.

#### *Opportunity #8 - Education and Training Approach*

- 1) The ED&S staff should become a proactive resource by periodically notify organizations of the common questions and violations.
- 2) Develop how-to videos and documentation for common questions and concerns to reduce the number of email and telephone inquiries.
- 3) Produce videos, computer-based sessions, and general training protocols to enhance the customer experience.

## Acknowledgement

We wish to thank all staff involved in this assessment for their professionalism and positive outlook. The timely completion of this assessment was due to their efforts and responsiveness to our requests.



### Overview

Texas Occupations Code Title 13. Sports, Amusements and Entertainment, Subtitle A. Gaming Chapter 2001.Bingo is the statute commonly cited as the Bingo Enabling Act (BEA) and is the authoritative document used to govern bingo licensing and enforcement activities. The BEA outlines roles and responsibilities of the Texas Lottery Commission (Commission), the Charitable Bingo Operations Division and license holders. The BEA is supplemented by Administrative Rules that further define roles and responsibilities. **Figure 1** provides excerpts from the BEA sections that provide the Commission’s authority to regulate and audit license holders.

Section	Title	Description
Sec. 2001.054	Rulemaking Authority	The commission may adopt rules to enforce and administer this chapter.
Sec. 2001.107	Training Program	(a) Unless the organization is a member of a unit that designates a unit manager under Section 2001.437, the bingo chairperson for a licensed authorized organization shall complete the training required by commission rule. For a unit operating under Subchapter I-1, the unit manager shall complete the training if the unit designates a unit manager under Section 2001.437. (b) A training program approved by the commission must include training related to: <ul style="list-style-type: none"> <li>(1) conducting bingo;</li> <li>(2) administering and operating bingo; and</li> <li>(3) promoting bingo.</li> </ul> (c) The commission by rule shall establish: <ul style="list-style-type: none"> <li>(1) the content of the training course;</li> <li>(2) information concerning training to be reported to the commission; and</li> <li>(3) other training program requirements that the commission determines to be necessary to promote the fair conduct of bingo and compliance with this chapter.</li> </ul>



Section	Title	Description
Sec. 2001.437	Unit Manager; License	(h) A unit manager must complete the training required by Section 2001.107.

**Figure 1 BEA Excerpts Related to Regulating and Establishing a Training Program** *The BEA provides the Commission’s authority to establish and regulate the training program to ensure compliance.*

CBOD’s E&DS is responsible for creating and administering the training and education program. The purpose of training and education activities is to ensure that content related to conducting charitable bingo is communicated and retained by the bingo community involved in executing bingo throughout Texas. This content emphasizes the Bingo Enabling Act (BEA) and Administrative Rules that have been adopted; additionally, each CBOD function (licensing, accounting, and audit) contribute to the content produced. Also, the E&DS is the help desk for all incoming inquiries regarding bingo matters which includes telephone and email correspondence.



## Opportunities and Recommendations

This section of the report contains a discussion of the overarching observations related to the Charitable Bingo Operations Division education program processes. CBOD's director requested an independent, objective assessment of CBOD's education program to identify ways to improve the program's content and delivery methods. Accordingly our focus was to assess current processes and determine:

1. Does the current required training reflect the regulatory requirements from the Bingo Enabling Act and Administrative Rules that CBOD, stakeholders and licensees are required to adhere to?
2. Is training conducive to the bingo communities learning styles and geared towards the bingo communities' interests?
3. Does CBOD's website facilitate information sharing of the requirements to obtain a license, conduct bingo and report on bingo operations?
4. Is the education and training function appropriately staffed to meet the commissions' objectives?
5. Does CBOD have sufficient documented procedures and guidelines to aide CBOD's E&DS staff to successfully execute their job responsibilities?
6. Does E&DS ensure that training is reviewed and revised as regulatory changes occur?
7. Is the current information system being used to facilitate the training program sufficient to meet the program's needs?
8. Is E&DS adding value to the stakeholders by being proactive when issues arise?

### ***Question 1: Does current required training reflect the regulatory requirements from the Bingo Enabling Act and Administrative Rules that CBOD, stakeholders and licensees are required to adhere to?***

Based on the current training content and the requirement to communicate regulatory guidelines and statutes to the trainee we concluded that the required training does not meet the regulatory requirements due to outdated content.

Sections 2001.107 and 2001.437 of the Bingo Enabling Act and Administrative Rule 402.103 requires bingo chairpersons and designated agents to have a valid certificate of completion of the required training program.

Currently, the Bingo training program consists of a series of six modules that the individual is required to complete to receive credit and a certificate of completion. The content for the on-line and the in-person classes are identical. However, the on-line training modules have associated test questions which the individual is required to answer. The Bingo training program takes approximately five hours to complete for the average user, and the on-line version will not allow printing of the completion certificate before the user has accumulated five hours of on-line time. There are other "special interest" modules that constitute part of the Bingo training program, which are voluntary.

Administrative Rule 402.400 (g) requires new license applicants to participate in a Pre-Licensing Interview before a license is issued.



We noted that the bingo chairperson training is outdated and forces the trainees to select incorrect answers. Additionally, the training content does not go beyond the basic requirements and the training materials are in the form of a standard PowerPoint presentation instead of using a variety of content delivery methods such as videos and interactive elements including reality-based scenarios.

CBOD offers the required training on-line through a link on their website. We completed the entire process of acquiring Bingo Service Portal credentials and then completing the required bingo chairperson training modules. In doing this, we noted the following:

- ✓ The Pre-Licensing Interview module was last updated in February 2010. Since then there has been three legislative sessions which has produced changes in fees, forms, systems and general Bingo protocols.
- ✓ The bingo chairperson training was also last updated in 2010. We noted several instances where a trainee has to select an incorrect answer choice to satisfy the training completion requirements and print their certificate.

Fourteen percent of the bingo chairpersons training slides and three percent of the pre-licensing interview slides contain incorrect or outdated information. **Figure 2** provides a summary of the current chairperson and pre-licensing interview training presentations.

Training Presentation	Part	Total Number of Slides in Presentation	Total Number of Slides with Incorrect or Outdated Content	Percentage with Incorrect Information or Outdated Content
Chairperson Training	1 - General Information	52	35	67%
Chairperson Training	2 - Licensing	73	4	5%
Chairperson Training	3 - Conducting a Bingo Occasion	52	1	2%
Chairperson Training	4 - Accounting Services	44	3	7%
Chairperson Training	5 - Record Keeping	56	0	0%
Chairperson Training	6 - Advertising and Promotions	39	0	0%
<b>Total</b>		<b>316</b>	<b>43</b>	<b>14%</b>
Pre-Licensing Interview	1 - Licensing Training for Conductor Organizations	77	3	4%
Pre-Licensing Interview	2 - Record Keeping	59	1	2%
Pre-Licensing Interview	3 - Compliance	51	1	2%
<b>Total</b>		<b>187</b>	<b>5</b>	<b>3%</b>

**Figure 2 Chairperson and Pre-Licensing Interview Training Presentations Summary of Incorrect or Outdated Information**

Training content should be updated every two years at minimum and when there are legislative changes that impact the accuracy of the content. The current staff has not updated training materials during their tenure at the agency.



*Recommendations:*

In order to improve the current training materials and content and ensure that they are relevant and correct we recommend the following:

1. Update all training and educations materials.
  - a. Prepare a comprehensive master listing of all current training materials that includes a description of the topic, the target audience, the format (brochure, PowerPoint, word/pdf document, video, etc), location and the last review/update. Maintain this master listing on CBOD's network drive and update it each time a training material is added, reviewed or changed.
  - b. Establish a project plan with responsibilities and firm timelines for updating all current training materials that are listed on the comprehensive master listing.
2. Establish a training materials review committee comprised of one individual from each of CBOD's functions and facilitated by the E&DS Coordinator. The training material review committee's responsibilities would be to (1) review all training materials on an annual basis for relevance and provide updates, (2) provide suggestions and additional training material content based on legislative updates, (3) provide input on training needs based on the nature of questions received and errors identified, and (4) test training materials for accuracy, clarity and functionality before they are placed on the CBOD website.
3. Develop a detailed written procedure for tracking, review and updates of all training materials. Include how new training topics are determined, who is responsible for creating the training materials, how frequently training materials are reviewed, and the training material committee roles and responsibilities.
4. Post a summary of legislative changes to Bingo's website after each legislative session along with a description or FAQ's that may result.

*Subsequent Actions Taken by CBOD:*

1. *The Bingo chairperson training presentation is currently under review. Module 1 and 6 has been completed. Modules 2, 3, 4 and 5 are pending.*
2. *CBOD is proposing to review the current rules and request consideration to eliminate the Pre-licensing interview requirement.*
3. *CBOD's E&DS Coordinator created a list of content for the online and class training materials.*
4. *The bingo training materials review committee was established in late March 2018 and consists of representatives from all CBOD departments.*
5. *The procedures for tracking, review and updates of all training materials were completed and approved.*
6. *Procedure to update Website and FAQ was created and is being routed for approval.*



## ***Question 2: Is training conducive to the bingo community's learning styles and geared towards the bingo community's interests?***

CBOD's current training materials and in-person sessions are geared towards a general audience and traditional learning styles. This model was effective when bingo was first authorized but is no longer effective for today's environment. People's time is limited and therefore it becomes even more critical to ensure that all training is as relevant, practical, and meaningful as possible for each participant.

The trainings offered by CBOD are intended to fulfill the statutory requirements, educate the bingo community of regulatory guidelines and equip bingo organizations with knowledge of their obligations to the Commission. However, when preparing a training for a diverse population of individuals specific questions should be asked to ensure the training is conducive to the target audience. These are:

1. Who is the target audience?
2. What are the training goals and objectives for the session?
3. What is the time duration of the session?
4. What is the best delivery format?
5. Is the training content new, revised or a refresher?

We discuss these questions in the following paragraphs.

### ***1. Who is the target audience?***

According to the Bingo Chairperson training program this training is geared towards providing the bingo chairperson for conductor licenses with the information that the bingo chairperson needs to know to properly manage and thoroughly supervise the entire bingo operation on behalf of the licensed authorized organization. Anyone involved in bingo is also encouraged to take this training.

CBOD's trainings are intended to educate the bingo community as a whole; however, it is important to understand the reason the participant is attending and their respective demographics. Although CBOD encourages anyone engaging in the operation of bingo in Texas to attend the chairperson training the information is not segmented or customized for the various interests and demographics that the participants represent.

Knowing and understanding the demographics of the audience can add value when determining the learning styles applicable to the audience. We obtained the information for all individuals that participated in CBOD's on-line chairperson training between 2001 and 2017. The two demographics that are important for determining training delivery methods are role and age. There are currently four primary roles that an individual holds within a bingo organization:



1. Chairperson
2. Designated Agent
3. Bookkeeper
4. Operator

The bingo training data does not track individuals listed as designated agents. We noted that many of the individuals served multiple roles within the bingo organization, some were chairperson only while others served as a combination of chairperson, bookkeeper and operator. We analyzed the age and roles for individuals participating in the on-line bingo chairperson training for 2016 and 2017; approximately 1,000 in total. We selected these two years because the training is only required to be completed once every two years. By selecting 2016 and 2017 we were able to capture participant information and reduce the possibility of double-counting although some individuals were listed for more than one role. As anticipated, more than two-thirds of the training participants were bingo chairpersons, followed by bookkeepers and then operators. When it comes to age, more than 56 percent of the participants were age 60 or older. **Figure 3** provides the role and age demographics for the on-line training during 2016 and 2017.

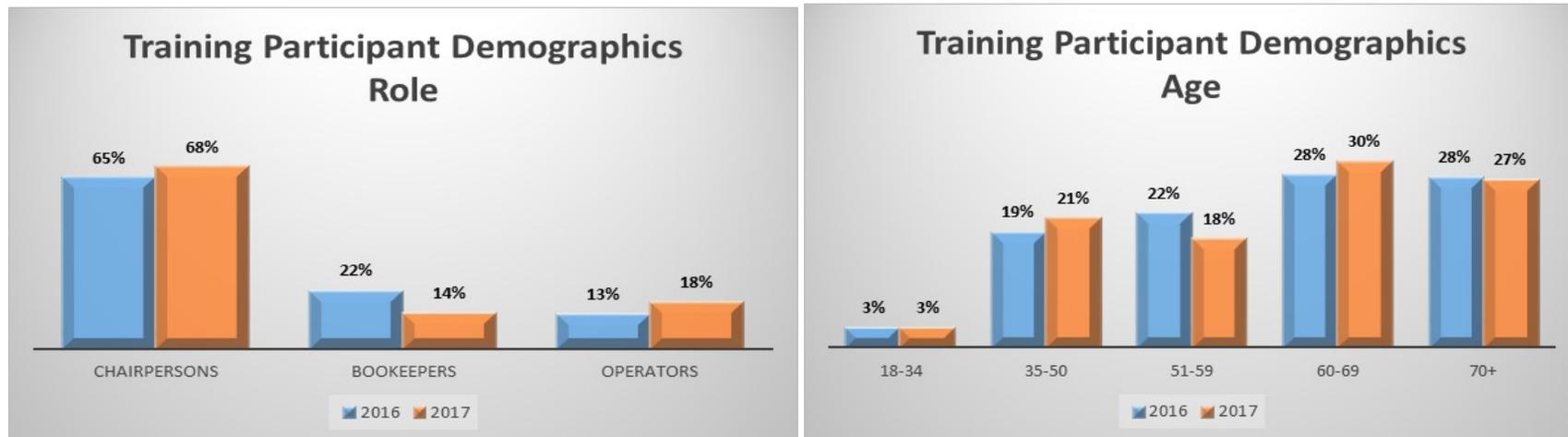


Figure 3 Bingo Role and Age Demographics for 2016 and 2017 Bingo Chairperson Training Participants



## 2. *What are the training goals and objectives for the session?*

Participants attend training based upon their roles and responsibilities within an organization. As such, training needs to be structured towards their interests and needs. In the case of bingo training although the bingo chairperson and designated agent are the only positions required to obtain training by regulation, there are more positions that would benefit from role specific training. These include:

- ✓ Bookkeepers
- ✓ Workers
- ✓ Charities

Currently, the bingo chairperson training is the only targeted training that CBOD offers.

## 3. *What is the time duration of the session?*

Having a clear timeframe in mind for training is imperative to ensuring that the participants retain the information being taught. This duration varies by the type of training; in-person, computer-based session, or computer-based training.

Regardless of the training delivery format two factors must be adhered to in order for training to be a success and increase knowledge retention:

- A. Keep sections short. Generally 20-30 minutes is the longest span that individuals can hold their concentration and focus. If the information being presented requires more than this it is best to break it up with a few questions, a video demonstration or a quick game that reinforces what was just discussed.
- B. Always state ahead of time how long the session will take. This allows the participant to concentrate on what is being discussed rather than guessing how much longer the sessions will take.

## 4. *What is the best delivery format?*

Although human interaction will always remain a key component of training, there are three primary training delivery formats used by organizations today.

- ✓ *In-person* training allows the trainer to develop a connection with the participant. Participants can engage with peers and trainers can discuss other issues as needed. In-person training can be as long or short as needed. However, there must be breaks included.
- ✓ *Webinars* typically last an hour or less and target specific information. They can be interactive and offer the instructor the capability to require participation in quizzes and offer credit or certificates.



- ✓ *Computer-based trainings* are becoming increasingly prevalent as technology becomes more widespread and easy to use. It allows data to be captured by users and offers the participant the capability to learn at their own pace. Also, quizzes and messages can be retained within the system hosting the training.

Regardless of the delivery format, there are ways to present the information that will increase interest and learning retention over straight reading and/or speaking. These include the following methods that can be used alone but are more effective when used in combination.

- ✓ Case studies provide an excellent way to meet adult learning styles. Adults tend to bring a problem-oriented way of thinking to their training. By analyzing real situations, participants can learn how to handle similar situations.
- ✓ Demonstrations and videos can be utilized to creatively communicate large amounts of information. Videos grab the participant’s attention and bring an element of entertainment to the training. Additionally, individuals tend to retain what they see and hear longer than then they do from reading paragraphs of the same information.
- ✓ Quick games break up the monotony, energize the participants and reinforce the information presented. Games can also include points, challenges and performance incentives for increased engagement.

**Figure 4** provides a summary of the format options, benefits and things to remember for the three training delivery formats.

Delivery Format	When To Use	Benefit	Things to Remember
In-Person	<ul style="list-style-type: none"> <li>Relationship building is also desired</li> </ul>	<ul style="list-style-type: none"> <li>Builds rapport</li> <li>Allows for real-time questions and answers</li> </ul>	<ul style="list-style-type: none"> <li>Include a variety of delivery methods such as videos, games, team work, and case studies</li> </ul>
Webinars	<ul style="list-style-type: none"> <li>Global reach is desired</li> <li>Compliance training is the goal</li> <li>Quick knowledge transfer is needed</li> </ul>	<ul style="list-style-type: none"> <li>Cost effective</li> <li>Reaches many participants across various geographic locations and time zones</li> </ul>	<ul style="list-style-type: none"> <li>Ensure the computer-based session link is easy to locate and join</li> <li>Include interactive sections</li> <li>Include test questions after each topic</li> </ul>
Computer-Based	<ul style="list-style-type: none"> <li>Self-paced learning is acceptable</li> </ul>	<ul style="list-style-type: none"> <li>Cost effective</li> <li>Participants can start, stop and replay as needed</li> <li>Participants can download the training materials</li> </ul>	<ul style="list-style-type: none"> <li>Ensure the link is easy to locate</li> <li>Include interactive sections</li> <li>Include test questions after each topic</li> </ul>

**Figure 4 Training Delivery Format Options and Benefits**

Research on adult learning styles is relatively new and there is limited studies to follow. However, what is available concludes that older adults express preference for the sensing, active, visual, and sequential styles of training rather than straight reading. This population tends to work better with facts rather than theories. They also like teamwork, prefer images to sounds, and are methodical in their learning process.



Based the bingo training participant demographics the current bingo chairperson training and all future training developed should not be based on the current PowerPoint delivery method.

### **5. *Is the training content new, revised or a refresher?***

The Bingo Enabling Act and Administrative rules dictate the content of the CBOD required training. Therefore, the training must be continuously updated and refreshed. It is important to highlight to the participant that there has been a change especially when it is something that effects operations or regulatory requirements. It is also important to reinforce the change that occurred. The use of test questions and quizzes can be used in these instances.

#### *Recommendations:*

This observation provides that basis for CBOD's training and education program redesign. The observation identified the effective learning techniques and why CBOD's current training content and delivery methods are no longer meeting needs. Therefore, CBOD should redesign the bingo chairperson training and also develop additional training modules geared towards the various roles that individuals have in the bingo organization.

- ✓ The bingo chairperson training should be a series of pre-recorded webinars or computer-based sessions with each webinar or computer-based session focused on a specific topic. Each webinar or computer-based session should be no longer than 45 minutes long and include videos, interactive questions and examples of operations or forms. The chairperson would need to complete each webinar or computer-based session in order to receive the certificate of completion.
- ✓ Optional training should be developed for bingo workers. This can be in the form of a quick video of a bingo hall and bingo workers in action with a discussion of the "to-do" and "not to-do".
- ✓ Mandatory training should be developed for bookkeepers. This should be a series of webinars or computer-based sessions that includes videos, interactive questions and examples of required forms.
- ✓ In-person training should be enhanced to include videos, case studies and interactive exercises. The training should be segmented so that the participants can attend specific sections.
- ✓ All training should be updated and refreshed at least once every two years and when regulations or requirements change.
- ✓ Regular webinars should be established to discuss hot topics and bingo operations. Ideally, these would be a live webinars that is held on a monthly basis and last no longer than 45 minutes. The webinars should be promoted and participation should be tracked to determine if this format is being accepted by the bingo stakeholders. The webinars should also be recorded and made available on the web site.

### Question 3: Does CBOD’s website facilitate information sharing of the requirements to obtain a license, conduct bingo and report on bingo operations?

The CBOD website contains a lot of information to assist stakeholders. However, the home page is not organized according to the different audiences needs and in a manner that is easy to locate information. The current home page layout requires a visitor to have a general understanding of bingo terms in order to be able to determine which button to click on or option to select. For example, a non-profit organization that has never conducted bingo or held a license would not know where to find the information they need to get started based on the current home page descriptions. **Figure 5** provides a screen shot of CBOD’s website home page.



Figure 5 CBOD’s Website Homepage

The website also does not contain checklists of steps needed to be completed for respective processes of obtaining or renewing licenses.



*Recommendations:*

CBOD should contract with a professional web developer to redesign their website. The website's homepage should be designed in a manner that the content is organized according to the respective user's purpose for visiting the website. For example, in addition to the current buttons of "locator" "reports" and "training" there should be buttons for information to be grouped according to the audience:

- ✓ One-time Bingo Fund-Raiser Event – contains a checklist, information and links for those individuals interested in what they need to do to have a one-time fundraiser.
- ✓ New License – contains a checklist of steps, information and links for those individuals seeking information on license requirements and how to apply.
- ✓ Current License Holder – contains information and links for current license holders.

In order to not have duplication of data and maintain information integrity, the website should be designed with links to the location of the data.

The first step that must be taken prior to initiating the redesign is to complete a comprehensive listing of all information and links that is currently on the website. This list should include the information topic/name, the intended audience(s) and the location. Once this is completed CBOD should determine what is relevant, what additions are required, create checklists and then work with the web designer to develop the updated website.

***Question 4: Is the Education and Training function appropriately staffed to meet the Commissions' objectives?***

CBOD's E&DS does have the appropriate staffing level to meet the Commissions' objective of providing training to bingo stakeholders. However, the oversight of this function is not at the appropriate management level. The current E&DS is comprised of a coordinator and one specialist. The E&DS Coordinator reports directly to the CBOD Director.

The E&DS requires more hands-on and direct oversight than what should be provided at the CBOD Director level. Although the E&DS was established in 2016 to provide dedicated resources towards implementing a robust education and training program most training materials have not been updated during this period. Furthermore, there has been no progress towards developing webinars, computer-based sessions and videos for training purposes. We believe this area has not developed at the progress that it should have because clearly defined expectations, deadlines and responsibilities were not established at the time the function was created and staffed.

E&DS staff rely on CBOD staff in other functions to provide updated content and information on current issues. This is an informal process that often ends up competing with staff's priority of getting their daily work completed. This is another contributing factor leading to delays in getting education and training materials updates completed.



Additionally, the CBOD auditors are not being used as a resource to provide hands-on training to bingo organizations to help them understand the recordkeeping requirements and audit process. The auditors are in the best position to provide bingo organizations training on the records requirements as they are the ones that are most familiar with them and end up auditing the records.

*Recommendations:*

1. During the time of our fieldwork there was an additional position added to CBOD organization. We recommend that E&DS report directly to this position.
2. Reiterate the expectations, duties, roles and responsibilities with each E&DS staff person to ensure that each individual is clear on their role in the success of the Commission's objectives.
3. Hold E&DS staff accountable for developing the robust education and training program and updating content according to project plans established. In observation #1.
4. Task the training materials review committee with ensuring that updated materials are provided to E&DS staff in a timely manner.
5. Establish an education and training component whereby CBOD's auditors in Austin and the regional offices provide training to bingo organizations on the required recordkeeping. This should be available as a one-on-one session when requested, regularly scheduled group sessions and webinars/computer-based sessions. The education and training should focus on explaining the required records that must be maintained, showing how the record's information is placed on the respective required forms and explaining the audit process. Providing this training would not impact the auditor's independence because (1) the auditor is not making management decision or assuming management responsibilities, and (2) the auditor is not preparing the records or completing the required forms for submission.

*Subsequent Actions Taken by CBOD:*

1. *The CBOD organizational structure was updated so that Education & Development Services department reports directly to the Operations and Program Administrator.*
2. *E&DS developed several education services procedures, updated training material and are working on special projects directed by the Operations and Program Administrator.*

***Question 5: Does CBOD have sufficient documented procedures and guidelines to aide Education and Training staff to successfully execute their job responsibilities?***

The E&DS staff lack sufficient documented procedures to aide in successfully executing job responsibilities. Additionally, there are no written guidelines that identify the goals, responsibilities and expectations for the agency's education and training program. Instead, the education and training program is managed through directives provided by the CBOD Director and experience of current staff.



In reviewing the current (as of October 2017) and previous (as of July 2015) versions of Procedure CB-SP-003, Bingo Training Program Management Procedure we noted that this procedure focuses solely on how to prepare and upload training materials. The October 2017 updated content has been shortened significantly and does not contain enough information to be able to complete the E&DS functions.

The current E&DS Coordinator is relatively new to the agency but has significant experience in developing training programs. The current E&DS specialist has been with the agency for many years and has in-depth knowledge of CBOD operations and bingo requirements. However, this combination of experience and knowledge does not substitute for well-developed written procedures and guidelines. Departmental procedures play a significant role in ensuring the staff are aware of the processes that they are responsible for. Guidelines ensure that staff know what the expectations are for implementing the education and training program. Additionally, well-documented detailed procedures and guidelines are necessary for the Education and Training function to ensure continuity and knowledge transfer.

*Recommendations:*

1. Develop detailed guidelines for the education and training program that describes the goals, responsibilities and expectations for the program. These should include performance metrics that staff should be capturing and reporting on. For example, the number of education and training materials reviewed, the number of education and training materials updated, the number of new education and training materials created, the average number of hours required to complete each review, the average number of hours required to develop new education and training materials, and the number of individuals taking each training, etc.
2. Revise procedure CB-SP-003, Bingo Training Program Management to be more detailed regarding the steps required for outlining, updating, testing and launching all training materials.
3. Develop a detailed checklist for E&DS staff to use when creating, reviewing or updating training materials. Require the checklist to be completed for all training material creation, review and updates.

*Subsequent Actions Taken by CBOD:*

1. Staff have developed several procedures to capture the goals and guideline to develop, conduct, track and report on the training program.

***Question 6: Does the Education and Development Services ensure that training materials are reviewed and revised as regulatory changes occur?***

The E&DS staff has been focused on special projects and handling daily inquiries in recent years. Therefore, reviewing and revising training content has not been a priority. Our review of the current training showed that the training is outdated by two to four legislative sessions. **Figure 6** provides a listing of the Pre-Licensing Interview and Chairperson training and the most recent updates.



Training Type	Training Section	Last Updated
Pre-Licensing Interview Part 1	Licensing	February 2010
Pre-Licensing Interview Part 2	Record Keeping	October 2009
Pre-Licensing Interview Part 3	Compliance	February 2010
Chairperson Training Part 1	General Information	June 2013
Chairperson Training Part 2	Licensing	June 2013
Chairperson Training Part 3	Conducting a Bingo Occasion	June 2013
Chairperson Training Part 4	Accounting	June 2013
Chairperson Training Part 5	Record Keeping	June 2013
Chairperson Training Part 6	Advertising	June 2013

**Figure 6 CBOD Pre-Licensing Interview and Chairperson Training Updates**

*Recommendations:*

1. Create an outline of imperative information for the Pre-Licensing Interview and Chairperson Training to serve as the framework for revising both trainings.
2. Although not required by statute, create an outline of imperative information for other bingo operations roles involving the administration of bingo at the hall level such as workers, bookkeepers and organizations in general. Use this outline as the basis for new training materials.
3. Develop and retain detailed outlines of training materials that reference specific regulations and statutes. This outline would serve as a checklist going forward for reviewing training content after each legislative session convenes.

*Subsequent Actions Taken by CBOD:*

1. E&DS staff is currently reviewing the training materials.
2. Procedures were created to ensure that the materials are updated regularly.

**Question 7: Is the current information system that is used to facilitate the training program sufficient to meet the program’s needs?**

The content management system that CBOD uses for its on-line training is able to meet CBOD’s training needs. However, CBOD is using an unsupported version and therefore is not using features available with the current version. CBOD has a presence on the Texas Lottery Commission’s YouTube Channel but has not updated the content and is not actively using this platform. Additionally, CBOD is not using the most up-to-date learning tools and methods that are readily available, such as videos and webinars and computer-based sessions.



CBOD utilizes the Moodle eLearning platform to administer the required Chairperson training which interfaces with TLC’s network. Without customization, this eLearning platform is free-of-charge for all users. The capabilities of the Moodle platform have been updated significantly since the last chairperson training was created and uploaded for the bingo community to use. While the Moodle system is user-friendly, administrators of the Moodle platform need to stay up-to-date on the systems capabilities and enhancements. CBOD staff have not done this and therefore do not fully understand the system’s capabilities and how to use them.

*Recommendations:*

- 1) Transition away from the MOODLE platform to the agency’s YouTube Channel.
- 2) Work with TLC’s Information Resources Department and Media Department to understand and use the agency’s YouTube Channel for the training platform.
- 3) Require the E&DS staff to become proficient with all training tools and methods including PowerPoint, YouTube, video, webinar applications and other computer-based applications. Prepare a professional development plan for E&DS staff that includes attending presentation and computer-based training sessions and conferences.
- 4) Place all YouTube procedures and training materials on CBOD’s network drive for knowledge transfer purposes.

***Question 8: Is the Education and Development Services function adding value to the stakeholders by being proactive?***

Currently the E&DS function primarily operates in a reactive mode rather than being proactive to inform stakeholders of commonly asked questions, potential issues, and changes within the requirements.

E&DS staff are usually an individual’s first interaction with CBOD when requesting general information. The staff encounters similar inquiries on a daily basis such as walking through Bingo Service Portal registration.

The E&DS Specialist serves as the front-line help desk operator for incoming inquiries via telephone and email. This position assists customers with questions regarding the Bingo Service Portal and acts as a liaison between the public and other CBOD functional areas. In recent years this individual was intricate in implementing the department’s most utilized information system, BOSS.

Currently, E&DS relies on the messages in the Bingo Services Portal and CBOD’s licensing department to notify license holders of potential violations related to complying with Bingo Enabling Act which could result in the suspension, denial, revocation of licenses after the violation has occurred.

*Recommendations:*

1. E&DS staff should become a proactive resource by periodically notify organizations of the common questions and violations.
2. Develop how-to videos and documentation for common questions and concerns to reduce the number of email and telephone inquiries.



3. Produce videos, webinars, computer-based sessions, and general training protocols to enhance the customer experience.

*Subsequent Actions Taken by CBOD:*

E&DS staff will develop additional videos to cover bookkeeper training and quarterly report training.