

Executive Summary of Changes for “GLI-19 V4.0, Standards for Interactive Gaming Systems” Public Comment Draft, Issued July 7, 2026

Below is an Executive Summary of the proposed changes in “GLI-19 V4.0, Standards for Interactive Gaming Systems” public comment draft:

- Reorganized and restructured document into more consumable chapters and sections, providing better distinction among the major technical areas of Platforms/Systems, Player Accounts, Remote Gaming, Random Number Generators, and Game Requirements.
- Incorporated requirements based upon industry best practices.
- The document has been reorganized to provide better clarity between technical requirements, which can be evaluated and certified, and internal controls, which can be audited.
- Added and updated terminology throughout the document to align with current interactive gaming operations, including updated usage of Interactive Gaming System, Gaming Platform, Player Account Manager, Remote Player Device, Player Application, Geolocation Solution, and related terms.
- Added reference to the GLI Gaming Security Framework (GLI-GSF) which will house the technical security controls and testing requirements for these systems.
- Incorporated limited alignment with widely-accepted jurisdictional and international standards.
- Added a “Use of Mechanisms” section to clarify that a required mechanism may be a critical component, documented process, operational procedure, technology, or a combination of approaches, with compliance evaluated based on effectiveness rather than a single prescribed implementation. (S 1.4.3)
- Expanded laboratory testing provisions to address source code access, compilation verification, additional testing when components are integrated with the Interactive Gaming System, and use of an adopted change management program to determine modification testing scope. (S 1.5.1)
- Reorganized Chapter 2 into Platform/System Requirements, focused on system clock, control program verification, wagering communications, system controls and overrides, information retention, and reporting. (chapter 2)
- Revised gaming management requirements to cover communication techniques, the ability to disable or suspend gaming activity, and game override capabilities such as voiding or cancelling games. (S 2.4)
- Expanded information retention requirements to cover gameplay, game themes and paytables, contests/tournaments, player accounts, bonusing/promotional offers, jackpots, system significant events, system verification records, and user accounts. (S 2.5)
- Revised reporting requirements to include general reporting expectations, game performance reports, operator liability reports, jackpot balancing reports, player account activity reports, and system significant event and alteration reports. (S 2.6)
- Moved and substantially expanded player account requirements into a dedicated chapter covering account registration and verification, account management, limitations, time-outs, suspensions, and bonusing/promotional offers. (chapter 3)
- Expanded registration and verification requirements to address collection of PII, KYC Solutions, identity verification, identity validation, location detection permission, and activation prerequisites. (S 3.2)
- Added mandatory multi-factor authentication (MFA) requirements at account creation, including recognized authentication factors and regulatory-body flexibility for alternative factors or time periods. (S 3.2.5)
- Expanded player account management to address authentication credentials, financial transactions, account statements or transaction logs, account updates, account closure, and inactive player accounts. (S 3.3)

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- Expanded responsible gaming tool requirements for limitations, time-outs, and suspensions, including player- and operator-initiated actions and restrictions on wagering or financial transactions during applicable periods. (S 3.4)
- Updated bonusing/promotional offer requirements to address player cancellation of participation and completion of offer terms, including treatment of restricted bonusing/promotional credits. (S 3.5)
- Organized the Remote Player Device and Application Requirements into its own chapter. (chapters 4)
- Expanded Player Application requirements to address application identification, validation, compatibility verification, secure communications, application errors, client-server interactions, application content, and cookies. (S 4.2)
- Added remote player access requirements addressing account-based wagering, MFA for login, post-login information, player access to operator display content, and inactivity re-authentication. (S 4.3)
- Added device and application integrity, monitoring, and security requirements, including persistent device identification, monitoring for multiple devices or accounts, device/application integrity and attestation, and application runtime protection. (S 4.4)
- Expanded geolocation requirements into a dedicated section addressing Geolocation Solution requirements, triggering actions, checks/logging/failures, data sources and cross-validation, spoofing/proxying/evasion detection, geolocation integrity risks, and beacon technology. (S 4.5)
- Expanded requirements regarding RNG Strength, including those related to software-based RNGs and hardware-based RNGs (s 5.3)
- Added a formal framework for “provably fair” RNGs, including commit-reveal logic, server seed commitments, client seeds, nonces or equivalent uniqueness functions, algorithm disclosure, and player verification tools. (S 5.5)
- Added Player Interface Requirements addressing player interfaces, adaptive displays, alternating displays, and simultaneous inputs and outputs. (S 6.2)
- Added or expanded game requirements for reel/line/way games, card games, dice games, immediate prize games, risk/crash/mine games, shooting/fishing games, drop/pachinko-style games, and puzzle solving games. (S 6.5)
- Expanded player fairness to cover independence from communications channels, win capping and truncation, and simultaneous wins for common awards. (S 6.7)
- Revised top award odds to provide further coverage on explicitly advertised awards (S 6.8)
- Expanded bonus/feature requirements covering token/symbol accumulation features and pre-game features. (S 6.9)
- Expanded requirements for progressive jackpots and incrementing bonus jackpots, defining an allowable tolerance for equivalent linked jackpot odds and outlining the method of calculation. (s 6.10)
- Removed the need of an Appendix C for Live Studio Audits by moving it into its own document, the GLI Live Gaming Studio Guide (GLI-LGS). (S 6.18)
- Added Spectator Wagering Requirements for wagering tied to host-player activity, including wager and player display, linked wagering, performance-based wagering, and related disclosures. (S 6.19)
- Reorganized Appendix A and restructured the internal controls into clearer sections for Internal Control Procedures, General Operating Procedures, Operator Display Content, Player Account Controls, Gaming Procedures and Controls, Integrity/Collusion/Fraud/AML-ATF Controls, and Geolocation Solution Controls.

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- Added or expanded internal control requirements for third-party service providers, prohibited or restricted persons, workstation access controls, test accounts, operator reserves, protection of player funds, taxation, complaints/disputes, chat features, responsible gaming, PII security, payment processing security, and use of algorithmic processing technologies. (Appendix A)
- Expanded operator display content requirements, including gaming rules, player protection information, terms and conditions, privacy policies, bonusing/promotional offer terms, contests/tournaments, and multi-language interactive gaming content. (A.4)
- Expanded player account controls, including manual registration and verification processes, one-account-per-player controls, fraudulent account procedures, player funds maintenance, responsible gaming tools, player account and device monitoring, and player loyalty programs. (A.5)
- Expanded gaming procedures and controls for RNGs monitoring, RTP evaluation, output monitoring, progressive jackpots and incrementing bonus jackpots, and sponsored players for P2P gaming. (A.6)
- Expanded integrity, collusion, fraud, and AML/ATF controls to address integrity and compliance programs, integrity monitoring and response, regulatory notification and reporting, AML/ATF procedures, and recordkeeping. (A.7)
- Added Geolocation Solution Controls for audits, accuracy radius, geolocation mapping, maintenance, fraud monitoring, reporting and analytics, and operator responsibilities for geolocation. (A.8)
- Revised Appendix B to remove the technical security controls and point to the GLI-GSF for Integrity and Security Assessments
- Expanded the Glossary of Key Terms and added or revised definitions for current gaming, account, security, geolocation, payment, “provably fair” RNGs, expanded game feature terminology.
- Added various notes to improve clarity of requirements, and to better document known conditions or restrictions.
- Made various grammatical changes throughout the document to improve clarity and readability.