

TEMPORARY PROCESS MODIFICATIONS DUE TO COVID19

- Waive Fingerprint Card Requirement
 - Financing Guidelines
 - Reporting Key Personnel Changes
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Fingerprint Cards

Due to the COVID-19 outbreak, it has become increasingly more difficult for applicants and customers of Alcoholic Beverage Control Division (ABCD)/Gambling Control Division (GCD) to have their fingerprints taken due to a large number of state and local agencies temporarily closing down their fingerprint operations.

- Normally, two sets of fingerprint cards per person are required to be submitted to the Department with several types of applications. As an accommodation for our customers that cannot get fingerprints taken during this time, the ABCD/GCD will **temporarily waive the requirement for fingerprint cards** and will do a name-based background check to determine suitability until fingerprints can be obtained.
 - This applies to applications for:
 - New Location Managers
 - Non-Institutional Loans
 - New Officers/Directors
 - Alcohol and/or Gambling licenses
 - The following information will continue to be required:
 - Personal/Criminal History Statement ([Form 10](#) or [Form 10A](#))
 - Any other forms and documents normally required with the submission
 - While fingerprint cards will not be required for current submissions, they will be required at a later date.
 - ABCD/GCD will follow up with a request once normal operations have resumed.
 - Upon request, two sets of fingerprint cards for each person must be submitted within 30 days along with the \$30 processing fee per person.

Financing Guidelines

We recognize that licensees may need to infuse extra funds into their business. It is our responsibility to ensure that financing for a licensed operation is not from an unsuitable source but in these times will implement a streamlined approach to speed up the review process.

- As a reminder, institutional loans (bank loans) do not require prior approval. Notification that a licensee has obtained a bank loan is only required with the license renewal submission.
- Non-institutional loans (non-bank loans) must have prior approval. In order to speed up the review process, please follow these guidelines:
 - Submit online.
 - Log into TAP and submit your request or send documents to Stacy Rogstad (srogstad@mt.gov) [via File Transfer \(transfer.mt.gov\)](https://transfer.mt.gov). Fax or mail may not be processed as quickly as an online submission.
 - Supply all required documents. Before ABCD/GCD can conduct their review, an application must be complete. The following are required:
 - Non-institutional Loan ([Form 13](#))
 - Personal/Criminal History Statement ([Form 10](#) or [Form 10A](#)) for each person providing funding
 - Loan agreement and/or promissory note
 - Amortization schedule and/or other applicable contracts or documents
 - Source of funding for the loan (e.g. 6 months of bank statements)
 - As noted in the above section, the requirement for fingerprint cards will temporarily be waived.
- Financing application submissions will be given priority during this time and will be processed as quickly as possible.

Faced with a cash flow crisis caused by mandatory closures due to COVID-19, we recognize that licensees may need a reprieve from certain debt payments or may need to make emergency loan modifications.

- As an accommodation during this time, ABCD/GCD will allow debt holders (landlords, lenders, etc.) to provide temporary reprieve from payments normally required by law and rule. *Bone fide emergency loan or lease agreement modifications will not be considered an improper NIL or undisclosed ownership interest.*
- Any agreements between the licensee and the debt holder to defer or forgive payments or change terms must be documented. The documentation should include details of the modification such as:

- Interest rate adjustment
- Monthly payment adjustment
- Monthly payment “holidays,” or forgiveness
- Change in the loan terms
- Timeframe for the modification (i.e. temporary or through the term)
- Other accommodations
- Documentation should be submitted to the Department no later than with licensees’ annual license renewal application, due June 30th.

Key Personnel Changes

We recognize licensees are faced with making difficult staffing decisions during this time. Administrative rule requires any change in location managers, officers, or directors must be reported to the department within 30 days of the date of the change. As an accommodation, we will not enforce 30-day notification of removal of any key staff during this time period and will allow for a reasonable timeframe for notification of new key staff.

- The license renewal application form (due June 30th) requires disclosure of any changes to managers, officers, and directors. Please ensure all changes are reported at that time (or before).

Questions? Contact Gambling Control Division at (406)444-1971.

NOTE: These temporary modifications are in place until further notice (at which time all processes will revert to standard procedures in accordance with statute and rule).