

## Exhibit X.A.3

### IDENTIFICATION OF PROBLEM GAMBLING

*Submit as Exhibit X. A.3. a description of the initial and ongoing training that will be used to help Gaming Facility employees identify those who may have gambling-related problems, or self-identify, and assist them to obtain help for those problems.*



---

## IDENTIFICATION OF PROBLEM GAMBLING

### EMPLOYEE TRAINING

Research shows that providing a training workshop that includes problem gambling information leads to individuals developing a better understanding of problem gambling whereas they felt more capable of effectively intervening among excessive gamblers and choosing the most appropriate moment to do so. At follow-up, those who had attended the workshop reported that they approached a problem gambler significantly more often than those who had not attended the workshop, and had discussed how to help problem gamblers significantly more often.

The New York Council on Problem Gambling has developed a training program that encompasses the required information and will deliver the training via face-to-face and online. Additional trainings will be developed and tested in conjunction with gaming facility staff.

All Nevele employees will be required to complete training on responsible gambling and problem gambling. Training will be provided upon initial hiring and refresher training will be required at least annually. An evaluation process will be in place that measures the individual employee's increase in knowledge and readiness to provide assistance.

Nevele Resort, Casino & Spa employees, whether casino floor staff, security or executive level staff members, play an important role in any responsible gambling program. Not only does staff provide assistance to those who seek them out, but they can also be a resource to patrons who are interested in learning more about responsible gambling in general. Floor staff can often be the first to see the signs of a gambling problem and therefore can have impact in helping those in need get assistance.

To that end, Nevele will ensure that:

- All new employees will be educated on responsible gambling and problem gambling.
- All floor staff will be required to complete responsible and problem gambling training at least annually.
- The Responsible Gambling Committee will be required to participate in related training quarterly.

- Nevele will implement communications programs for employees to improve their understanding of responsible gambling and related policies and procedures.
- Information on responsible gambling awareness including the HOPEline number will be posted in various places where employees congregate.
- The training objectives will be made clear to the learners.
- The training will include content that answers the questions: (1) what is chance and randomness? (2) Is there a link between misunderstanding the concept of chance and excessive gambling? (3) How does one recognize the symptoms of this illness? (4) How will the employee intervene if they decide to do so?
- A second level of training will be provided to floor staff who will be taught skills and procedures required of them for assisting patrons who may have problems with gambling.
- A third level of training specific for those Nevele staff who would be responsible for initiating conversations with patrons who may have a problem will be implemented and reviewed annually.
- There will be a verification process in place to ensure staff complete required training.
- There will be an evaluation process in place to measure the effectiveness of the training program.
- Nevele Employee Assistance Program (EAP) Counselor(s) will be trained to assess and screen for problem gambling.

### Providing Assistance

To the extent that the patron is willing to receive information, Nevele will provide individuals suspected of having a gambling problem with information and assistance in connecting with local support services. The process of identifying individuals who may have a problem will be both proactive and responsive.

Nevele Resort, Casino & Spa staff will have daily involvement with patrons and therefore play a critical role in recognizing and assisting patrons who may be experiencing problems. This assistance is essentially an extension of their already existing customer service goals.

To that end, Nevele will ensure that:

- Clear procedures will be in place for assessing and assisting a patron who may have a gambling problem.
- All staff will be aware of the policies and procedures for assisting patrons.
- All staff will be knowledgeable about the HOPEline and self-exclusion, and be able to direct patrons seeking information.
- Designated staff will initiate discreet discussions with patrons who show patterns or behaviors that may be signs of a gambling problem.
- Designated staff may provide assistance in a comfortable setting such as the RGRC private office.
- Local treatment resources, gamblers anonymous information and other support service information is provided to the patron in a form that can be taken away for review.
- If the patron is interested and willing, a direct connection will be made with the appropriate local treatment or self-help resources.
- A process and system for recording and tracking individual problem gambling related issues will be developed with the intention of using the data to inform effectiveness and improvement of Nevele's overall responsible gambling program performance.

**Notes**

This page intentionally left blank for reviewer notes.