Submit as Exhibit X.A.1. a description of on-site resources that will be available to those affected by gambling-related problems, including procedures for the exclusion of self-identified problem gamblers who request that they be prohibited from entering facilities throughout the State’s various gaming venues.

Overview of Tioga Downs’ Responsible Gaming Efforts

Throughout its tenure as a pari-mutuel and VLT facility, Tioga Downs ownership and management has emphasized a culture of Responsible Gaming with a continuous improvement focus. In 2013, Tioga Downs participated (as a New York Gaming Association member) in the development of the robust New York Council on Problem Gaming (NYCPG) facility evaluations and recommendations. On December 2, 2013, Tioga Downs management participated in onsite meetings and facilitated an audit procedure of Responsible Gaming practices with NYCPG staff. The audit results and recommendations are included on the following pages. Tioga Downs is fully committed to achieving all criteria per the Responsible Gambling Policies, Practices and Procedures of the New York Council on Problem Gaming Summary Analysis. Tioga Downs has met with individuals of this organization and local providers to continue to strengthen our Problem Gaming Program. Such measures included a follow up analysis in July 2014, and ongoing training and participation with New York addiction professionals at all levels.

While Tioga Downs is proud of its past and current commitment to promoting Responsible Gaming, management and ownership also look forward to the new opportunities and challenges that expanded gaming brings to New York. Tioga Downs will actively work with the New York Gaming Commission, NYCPG, OASAS and other stakeholders to ensure Responsible Gaming ethics and concerns are kept at the forefront of our operations and employee culture.

With the expansion of gaming in New York, Tioga Downs recognizes the additional challenge to appropriately educate youth regarding gambling. In particular, poker is often glamorized through mainstream media targeting a younger demographic (i.e., poker championships on cable sports channels). Should Tioga Downs receive a casino license, we will partner with area school districts to support educational initiatives directed at appropriate messaging focused on secondary school populations.

Tioga Downs has also taken its responsible gaming efforts out into the community. The Director of Internal Audit has been asked to present at a conference of health professionals who treat problem gambling. These community interactions will help ensure that Tioga Downs remains at the forefront of identifying and assisting with problem gaming issues.
On-Site Resources for Problem Gaming

Tioga Downs takes its responsibility with regard to problem gambling extremely seriously and already has a robust set of protocols and procedures in place to address problem gaming issues. Tioga Downs will continue to research, develop, and implement protocols to address problem gambling in order to ensure that its problem gambling program remains second to none. On-site resources for individuals identified as showing signs/symptoms of problem gaming behavior include:

1. A manager/supervisor on duty available during all hours of operation who is trained in recognizing signs of addictive gaming behaviors. The individual will also be trained in best practices regarding customer interaction on the topic of problem gambling. This manager/supervisor will be the designated “Responsible Gaming Captain” (“RGC”) for his/her shift. The RGCs name, title, and contact information will be provided to all staff as part of a Daily Operating Brief. The RGC is supported by Tioga Downs’ entire work force. The RGC dovetails with the training and certification provided to all employees at New Hire Orientation, and on an annual basis, in the area of responsible gaming.

2. Self-Exclusion. Tioga Downs has a thorough self-exclusion program, consisting of the following components:

   A. A guest may request a self-exclusion in person at the Security Office or on-line at TiogaDowns.com, under the Responsible Gaming section. The self-exclusion form is available at two separate places on the website.

   B. A guest requesting self-exclusion can mail the completed form to the Director of Security or bring the form into the Security Office. All Security Officers are able to direct the patron to the appropriate place on the property to submit the form.

   C. Received self-exclusion forms are kept in a notebook in the Security Department and entered into Tioga Downs’ self-exclusion database as a self-excluded guest. When a guest is added to the self-exclusion list, a Security Supervisor will immediately notify the following departments: Players Club, Marketing, and Internal Audit. On a weekly basis, the Security Department sends an updated self-exclusion list to all appropriate departments.

   D. The Surveillance Department continually monitors the casino floor for any excluded guest. If the Surveillance Department observes an individual who may be an excluded guest, the Surveillance Department immediately notifies the Security Supervisor.
E. The Security Supervisor will investigate any potentially excluded guest on the property. If it is determined that the guest is excluded, Security will direct the guest to leave the property immediately and take necessary steps to ensure that the guest departs.

F. Before any promotional prize is awarded to a guest, the Players Club will verify that the guest is not on the current list. Additionally, the Players Club will look up all guests in the master property database to ensure that the guest is not listed as excluded. The rules for all promotions are to include a statement to the effect that excluded patrons may not win any promotional prize. Forms signed by prize winners shall include an acknowledgment that their gaming activity has not been restricted.

G. No jackpot may be paid to any person on the self-exclusion list, and no self-excluded patron will be permitted to recover any losses.

H. The Internal Audit department periodically compares the exclusion list to the records contained in the master property database to verify the accuracy of both. Any discrepancies are to be reported to the General Manager.

I. Tioga Downs is in the process of developing an interview protocol for self-excluded patrons who seek to be removed from the self-exclusion list. Before allowing self-excluded patrons to be removed from the self-exclusion list, this protocol will be applied. As part of the protocol, a responsible official will interview the patron to ascertain why the patron seeks to be removed from the list; what has changed in the patron’s circumstances such that the patron no longer believes they need to self-exclude; and other factors relevant to the patron’s request to ensure that the patron is seeking to be removed from the list for good cause.

3. Comprehensive onsite communications to encourage responsible gaming. Tioga Downs currently utilizes thorough communications which encourage responsible gaming activities. These resources also direct patrons to state resources, including a toll-free assistance line staffed on a 24 hour basis. The 24 hour state assistance line can now be reached by text message as well, and Tioga Downs has been working to publicize this additional channel for patrons to seek assistance. Multi-media resources currently include brochures, posters, electronic signage, and staff who can discuss with guest the resources available for assistance with problem gaming. Self-exclusion programs available to patrons will be highlighted with brochures placed at key customer touchpoints including cage/cashier, marketing operations/player club, valet and casino host work spaces.

Tioga Downs is also currently in discussions with a responsible gaming treatment provider to potentially make office space available for the treatment provider’s use on-site at Tioga Downs in the event that a patron wishes to consult with a treatment provider while on-site.
Should Tioga Downs receive a casino license and expand the facility, management looks forward to creating a *Responsible Gaming Resource Center* (anticipated to be located in or adjacent to Security) which will provide additional resource materials and an area for “cooling off” for those individuals concerned with their gambling activity or who wish to obtain additional information.

4. **A Responsible Gaming Committee to monitor all issues relating to problem gaming.** In 2014, Tioga Downs formed a Responsible Gaming Committee led by the Assistant General Manager/Vice President of Gaming Operations, with representation from line level, supervisory and management team members recruited from a number of departments including cage, marketing, gaming, security, surveillance, and human resources. The Responsible Gaming Committee is charged by senior leadership to examine Tioga Downs’ processes, programs and Responsible Gaming programs to ensure continued quality execution of the Responsible Gaming vision. The Responsible Gaming Committee meets on a monthly basis. Sample agenda items include:

- Creating an employee campaign to highlight aspects of Responsible Gaming;
- Streamlining and enhancing the self-exclusion process, including emphasizing options available to the individual on a local, state, and national level; and
- Arranging for a Gambling Addiction clinician to present to employees. This presentation currently occurs on an annual basis to every employee to assist in training every employee in how to identify and assist those who may need assistance with problem gaming.
New York Council on Problem Gambling, Inc.

Best Practices for Problem Gambling Prevention and Intervention at New York Gaming Association Member Facilities 2014

*Tioga Downs Casino*
In 2013 the New York Gaming Association (NYGA) contracted with the New York Council on Problem Gambling Inc. (NYCPG) to deliver the following:

1) NYCPG shall meet with the New York Gaming Association to discuss planning for follow-up meetings with individual members, analysis of the written procedures and practices at each member facility, reports to each individual member concerning an analysis of their procedures and practices and the scope of written Best Practices for all NYGA members.

2) NYCPG will complete meetings at each of the nine (9) NYGA Gaming Facilities and review and assess existing policies, practices and procedures at each NYGA Member.

3) NYCPG will have prepared and delivered an analysis to each member facility with a carbon copy to NYGA containing a written analysis and assessment of the existing policies, practices and procedures with regard to problem gaming in each of its facilities and written recommendations to each facility.

4) NYCPG will deliver to NYGA a written Best Practices (BP) Manual with written standards.

5) NYCPG will schedule and complete employee training on-site at each NYGA Member facility as well as develop an online training tool. As part of employee training, NYCPG will provide resources, toolkits and print materials for outreach education support; deal with underage gaming compliance and assessment of compliance with Responsible Gambling practices.

Enclosed please find the Responsible Gambling Policies, Practices and Procedures New York Council on Problem Gambling Summary Analysis. The information contained within the analysis was derived from the information NYCPG received during the meeting with Executive staff and through the tour of the casino. The analysis is based on eight overarching RG areas which contains several criteria. Each criteria received a “yes” or “no” response and is followed by comments and/or a reference to the appropriate section within the Best Practices Manual that discusses recommendations for improvement.

Following the analysis you will find the Best Practices for Problem Gambling Prevention and Intervention at NYGA Member Facilities Manual. The Best Practices Manual is a compilation of recommendations for improved Problem Gambling and Responsible Gambling practices. The recommendations are based on existing Responsible Gambling (RG) research and current practices of New York Gaming Association member facilities.

Additionally, NYCPG has developed an employee training on Problem and Responsible Gambling. Problem and Responsible Gambling Training for Casino Employees is enclosed and will be available online and for face to face delivery beginning March 1, 2014. Further information on training opportunities will be sent to NYGA members as it becomes available.
While we understand that some practices are controlled by NYS regulation and some will be challenging to implement currently, striving for the protection of casino patrons in the most effective form must be the long-term goal. Therefore, we envision the process of analyzing and implementing Best Practices at NYGA Gaming Facilities as ongoing and we look forward to working together to achieve the highest standards possible.
Responsible Gambling Policies, Practices and Procedures  
New York Council on Problem Gambling Summary Analysis

**Tioga Downs Casino**

Meeting and site visit conducted on December 2, 2013  
**Contact:** John Clark, Regional Director of Internal Audit

1. **Responsible Gambling Policies:**

   The facility/corporation demonstrates awareness of problem gambling and creates integrated corporate policies and strategies to actively address it.

<table>
<thead>
<tr>
<th>Criteria</th>
<th>YES</th>
<th>NO</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Facility has Responsible Gambling (RG) policies, strategies and practices</td>
<td>X</td>
<td></td>
<td>While these policies were clear to executive staff they were not in writing anywhere for all staff, patrons, or public to review. See pg. 16 recommendation 1.d</td>
</tr>
<tr>
<td>RG policies are specifically written out in a manual or employee handbook</td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Written RG policies and practices are given to each casino employee (i.e. through training, employee handbook, separate handout, etc.)</td>
<td></td>
<td>X</td>
<td>See pg. 16 recommendation 1.d</td>
</tr>
<tr>
<td>An Executive staff member is accountable for RG policies and programs</td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>There are regular reminders to all staff about RG</td>
<td></td>
<td>X</td>
<td>See pg. 16 recommendation 1.e, see pg. 29 recommendation 8.c</td>
</tr>
</tbody>
</table>
2. Underage Gambling Policies and Practices:
*The facility prohibits underage gambling and focuses efforts on preventing youth access to the gaming floor.*

<table>
<thead>
<tr>
<th>Criteria</th>
<th>YES</th>
<th>NO</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Signs referencing that you must be 18 to gamble are posted at entrances to the facility</td>
<td></td>
<td>x</td>
<td></td>
</tr>
<tr>
<td>Signs referencing that you must be 18 to gamble are posted at entrances to the gaming floor</td>
<td></td>
<td>x</td>
<td></td>
</tr>
<tr>
<td>Underage gambling information and/or forms are available on the facility website</td>
<td></td>
<td>x</td>
<td>See pg. 18 recommendation 2.b</td>
</tr>
<tr>
<td>Security officers are posted at entrances to the gaming floor</td>
<td></td>
<td>x</td>
<td></td>
</tr>
<tr>
<td>Security officers are held accountable for checking IDs of patrons who look 30 or younger</td>
<td></td>
<td>x</td>
<td></td>
</tr>
<tr>
<td>If underage patrons are identified on the gaming floor there is a clear plan of action for staff and security to follow</td>
<td></td>
<td>x</td>
<td>See pg. 18 recommendation 2.h</td>
</tr>
<tr>
<td>The facility has taken added measures to ensure youth have no reason to enter the gaming floor at any time (i.e. building design, traffic flow rerouting, etc.)</td>
<td></td>
<td>x</td>
<td></td>
</tr>
<tr>
<td>The facility utilizes age verification card readers</td>
<td></td>
<td>x</td>
<td></td>
</tr>
</tbody>
</table>
3. Self-Exclusion Program:
A well-managed and communicated self-exclusion program is in place that facilitates access to counseling and other supports.

<table>
<thead>
<tr>
<th>Criteria</th>
<th>YES</th>
<th>NO</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Facility staff are aware of the procedures for assisting patrons interested in self-excluding</td>
<td></td>
<td>x</td>
<td></td>
</tr>
<tr>
<td>The security office has a private area that is used to help patrons fill out the paperwork</td>
<td></td>
<td>x</td>
<td></td>
</tr>
<tr>
<td>A player tracking system is used and players are flagged across multiple systems (i.e. security, marketing, players club, etc.)</td>
<td></td>
<td>x</td>
<td></td>
</tr>
<tr>
<td>Updates to registered patrons in the player tracking system are sent regularly to all relevant departments</td>
<td></td>
<td>x</td>
<td></td>
</tr>
<tr>
<td>Patrons who self-exclude are provided resources on problem gambling (this is in addition to the helpline number)</td>
<td></td>
<td>x</td>
<td></td>
</tr>
<tr>
<td>Individuals who self-exclude are required to wait until their exclusion period has expired before they can return to the facility</td>
<td></td>
<td>x</td>
<td></td>
</tr>
<tr>
<td>Excluded individuals stop receiving promotional materials as soon as possible following the time of exclusion</td>
<td></td>
<td>x</td>
<td></td>
</tr>
<tr>
<td>A strong enforcement process is in place to identify and remove self-excluded patrons</td>
<td></td>
<td>x</td>
<td></td>
</tr>
<tr>
<td>Once the exclusion period has expired, being removed from the self-exclusion list is not automatic and a formal request must be made by the patron.</td>
<td></td>
<td>x</td>
<td></td>
</tr>
<tr>
<td>Patron requests for removal from the self-exclusion list are reviewed by an Executive level staff member and determinations made on a case by case basis</td>
<td></td>
<td>x</td>
<td>Individual must come in to talk with the Security Supervisor before they can be removed from the list.</td>
</tr>
<tr>
<td>Criteria</td>
<td>YES</td>
<td>NO</td>
<td>Comments</td>
</tr>
<tr>
<td>-------------------------------------------------------------------------</td>
<td>-----</td>
<td>----</td>
<td>-----------------------------------------------</td>
</tr>
<tr>
<td>Self-exclusion information/ brochures are available to patrons throughout the gaming facility</td>
<td></td>
<td>x</td>
<td>See pg. 19 recommendation 3.a</td>
</tr>
<tr>
<td>Self-exclusion information and/or forms are available on the facility website</td>
<td>x</td>
<td></td>
<td></td>
</tr>
<tr>
<td>After a period of exclusion has expired patrons must sign up to get back on to the Player’s Club marketing systems it in not automatic</td>
<td>x</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
4. Information and Messaging:

*Information on Responsible Gambling and Problem Gambling is up to date and readily available to patrons.*

<table>
<thead>
<tr>
<th>Criteria</th>
<th>YES</th>
<th>NO</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Informational pamphlets and posted signs are used to share responsible</td>
<td></td>
<td></td>
<td>A palm card created by the Tioga County Council on Addiction and Substance Abuse is used at this facility. Signage is created by the NYS Gaming Commission.</td>
</tr>
<tr>
<td>gambling messaging</td>
<td>x</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The 24 Hour HOPEline number is posted throughout the facility</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Self-exclusion related signs are posted throughout the facility</td>
<td></td>
<td></td>
<td>See pg. 19 recommendation 3.a</td>
</tr>
<tr>
<td>Underage Gambling related signs are posted throughout the facility</td>
<td></td>
<td></td>
<td>See pg. 21 recommendation 4.a</td>
</tr>
<tr>
<td>All posted signs are large enough to be easily read</td>
<td></td>
<td></td>
<td>Facility created their own larger versions of the RG signs supplied by the Gaming Commission. These were much easier to read and well placed in the facility.</td>
</tr>
<tr>
<td>All signs are conspicuously posted</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Posted signs are in multiple languages</td>
<td></td>
<td></td>
<td>See pg. 21 recommendation 4.e</td>
</tr>
<tr>
<td>At minimum signs are posted near entrances, exits, the cage and customer</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>service areas</td>
<td>x</td>
<td></td>
<td></td>
</tr>
<tr>
<td>RG signs are posted on ATMs or on the wall directly behind where ATMs</td>
<td></td>
<td></td>
<td>See pg. 21 recommendation 4.d</td>
</tr>
<tr>
<td>are located</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Wall posters, back lit displays and or electronic signs include RG</td>
<td></td>
<td></td>
<td>See pg. 21 recommendation 4.g</td>
</tr>
<tr>
<td>messages</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>A brochure, palm card or other pamphlet on RG is available at the cage,</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>security and customer service areas</td>
<td>x</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Criteria</td>
<td>YES</td>
<td>NO</td>
<td>Comments</td>
</tr>
<tr>
<td>------------------------------------------------------------------------</td>
<td>-----</td>
<td>----</td>
<td>--------------------------------------------------------------------------</td>
</tr>
<tr>
<td>A separate brochure and/or information on underage gambling is available</td>
<td></td>
<td>x</td>
<td>See pg. 21 recommendation 4.h</td>
</tr>
<tr>
<td>An RG message is on all electronic and print communication including email marketing, website, etc.</td>
<td></td>
<td>x</td>
<td></td>
</tr>
<tr>
<td>Signs on problem gambling including the 24 hour HOPEline number are posted “back of the house” for employees</td>
<td></td>
<td>x</td>
<td>It is of note that this was put into place at Vernon Downs immediately following our visit to this facility. See pg. 21 recommendation 4.k</td>
</tr>
<tr>
<td>Other outreach efforts on RG take place at the facility such as tabling events, health fairs, RG specific emails, mailers, etc.</td>
<td></td>
<td>x</td>
<td>See pg. 21 recommendation 4.l</td>
</tr>
</tbody>
</table>
5. Informed Decision Making:

*Facility provides substantial and readily available information to enable patrons to make informed decisions.*

<table>
<thead>
<tr>
<th>Criteria</th>
<th>YES</th>
<th>NO</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>The facility has policies and procedures related to informed decision making, which promote gambling literacy (i.e. basic, general information about the fundamental aspects of how gambling works and key safeguards all gamblers should know, risk factors, and help availability)</td>
<td></td>
<td>x</td>
<td>See pg. 23 recommendation 5.a</td>
</tr>
<tr>
<td>The facility provides a variety of information that will assist patrons in making informed decisions about their gambling</td>
<td></td>
<td>x</td>
<td>See pg. 23 &amp; 24 recommendation 5.b, c, d</td>
</tr>
<tr>
<td>The facility has designated player information or support services onsite (i.e. resource centers)</td>
<td></td>
<td>x</td>
<td>See pg. 24 recommendation 5.f, g, i</td>
</tr>
<tr>
<td>The facility provides patrons access to information about their own play</td>
<td>x</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
6. Assisting Patrons who May Have Problems with Gambling:
Assistance to patrons who may have problems with gambling is readily available and systematically provided.

<table>
<thead>
<tr>
<th>Criteria</th>
<th>YES</th>
<th>NO</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Clear policies are in place for assessing and assisting a patron who may have a gambling problem</td>
<td></td>
<td>x</td>
<td></td>
</tr>
<tr>
<td>All staff are aware of the policies and procedures for assisting patrons</td>
<td></td>
<td>x</td>
<td></td>
</tr>
<tr>
<td>Designated staff initiates discreet discussions with patrons who show patterns or behaviors that may be signs of a gambling problem</td>
<td></td>
<td>x</td>
<td>All gaming attendants are allowed to approach and help customers they may have a relationship with, they may give them the palm card</td>
</tr>
<tr>
<td>All staff is knowledgeable about the helpline and self-exclusion and are able to direct patrons seeking information.</td>
<td></td>
<td>x</td>
<td></td>
</tr>
</tbody>
</table>
7. Access to Money:
Money and money services are provided to patrons in a responsible manner that does not encourage excessive spending.

<table>
<thead>
<tr>
<th>Criteria</th>
<th>YES</th>
<th>NO</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>A reasonable number of ATM machines are in place</td>
<td>x</td>
<td></td>
<td>All machines were located off the gaming floor</td>
</tr>
<tr>
<td>ATM machines are available but not advertised in such as way as to encourage withdrawal or excessive spending</td>
<td>x</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Access to credit is prohibited</td>
<td>x</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Check cashing is prohibited</td>
<td></td>
<td>x</td>
<td>See pg. 27 recommendation 7.b, c</td>
</tr>
<tr>
<td>Access to money directly at electronic gaming machines is prohibited</td>
<td></td>
<td>x</td>
<td></td>
</tr>
<tr>
<td>The facility imposes its own additional limit on daily funds access (this is above and beyond or regardless of the individuals ATM or bank limitations)</td>
<td>x</td>
<td></td>
<td>A maximum limit of $3000 per day on credit card advances is enforced by the facility regardless of the patrons personal bank limits.</td>
</tr>
</tbody>
</table>
8. Employee Training:

Staff understands the importance of RG and are knowledgeable about their role and the corporation’s expectations of their actions.

<table>
<thead>
<tr>
<th>Criteria</th>
<th>YES</th>
<th>NO</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>An RG employee training program is provided</td>
<td></td>
<td>x</td>
<td>Online training, <em>Red Flags and Referrals</em> is required</td>
</tr>
<tr>
<td>The training is provided as part of a new employee orientation program</td>
<td></td>
<td>x</td>
<td></td>
</tr>
<tr>
<td>RG training for employees is also conducted annually</td>
<td></td>
<td>x</td>
<td></td>
</tr>
<tr>
<td>RG policies are explained to employees along with codes of practice, self-exclusion procedures and regulations</td>
<td></td>
<td>x</td>
<td></td>
</tr>
<tr>
<td>Staff learn about problem gambling and its impact as well as key RG information</td>
<td></td>
<td>x</td>
<td></td>
</tr>
<tr>
<td>Staff are taught skills and procedures required of them for assisting patrons who may have problems with gambling</td>
<td></td>
<td>x</td>
<td></td>
</tr>
<tr>
<td>Objectives of the training are clear and accessible to learners</td>
<td></td>
<td>x</td>
<td></td>
</tr>
<tr>
<td>There is a process in place for verifying staff has completed the training.</td>
<td></td>
<td>x</td>
<td>All staff are required to complete the course and it is tracked by the Human Resource Department. The course requires completion of a quiz and provides a certificate of completion.</td>
</tr>
<tr>
<td>A formal evaluation process is in place</td>
<td></td>
<td>x</td>
<td>See pg. 29 recommendation 8.i</td>
</tr>
</tbody>
</table>

*The standards and criteria utilized in this assessment were adapted from the Responsible Gambling Centre’s *Responsible Gambling Index*. More information can be accessed at [http://rgcheck.com/](http://rgcheck.com/). Adaptations were made to the standards and criteria based on NYGA facilities current practices and existing regulations, feasibility for implementation and practical application given existing facility layouts.
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NEW YORK COUNCIL ON PROBLEM GAMBLING, INC.
I. Introduction

Problem Gambling is a pervasive disorder that can result in serious consequences for individuals, families, and communities. A Gambling Disorder is a diagnosable condition outlined in the American Psychiatric Association Diagnostic and Statistical Manual of Mental Disorders 5. According to the National Council on Problem Gambling, approximately 1% of US adults meet criteria for a Gambling Disorder and another 2-3% are considered Problem Gamblers.

While most casino patrons gamble for fun and entertainment, there is a small percentage that will experience problems. It is the responsibility of the gaming facility to ensure that every effort is made to prevent the development of gambling problems and to promote Responsible Gambling practices. Additionally, when interventions are appropriate the gaming facility should initiate customer service practices that support the individual and protect other casino patrons from the consequences of Problem Gambling.

In this manual we will review the following eight areas where these prevention and intervention procedures can be addressed:

1. Responsible Gambling Policies
2. Underage Gambling Policies and Practices
3. Self-Exclusion Programs
4. Information and Messaging
5. Informed Decision Making
6. Assisting Patrons Who May Have Problems with Gambling
7. Access to Money
8. Employee Training

These eight areas and their accompanying standards and criteria were adapted from the Responsible Gambling Centre’s Responsible Gambling Index. More information can be accessed at http://rgcheck.com/. Adaptations were made to the standards and criteria based on NYGA gaming facilities current practices and existing regulations, feasibility for implementation, and practical application given existing facility layouts.
Overall it is the intention that this review process will:

- Provide the gaming venue with an objective check on internal Responsible Gambling policies and procedures;
- Identify areas of weaknesses and strengths in a gaming venue’s Responsible Gambling efforts;
- Act as a check and balance to promote the adoption of improved practices in gaming venues;
- Provide the gaming venue with effective ideas for improving Responsible Gambling programs and services on an ongoing basis;
- Assure gamblers that gaming providers take their safety seriously and;
- Increase public confidence
II. Recommendations

1. Responsible Gambling Policies- The facility demonstrate awareness of Problem Gambling and creates integrated corporate policies and strategies to actively address it.

Example Policy-
Tioga Downs Casino pledges to our employees, our patrons, and the community to make responsible gaming an integral part of our daily operations. This pledge includes employee assistance and training and casino gambling advertising and marketing. This policy also covers the commitment of our company to continue support for patron assistance and public awareness surrounding Responsible Gaming and Underage Gambling.

According to Blaszczynski, et. al (2004), “...there is no clear operational definition or consensus as to what ‘Responsible gaming practices’ or ‘responsible code of conduct’ actually means; therefore, it is difficult to develop an empirical base for research related to these constructs.” However, the general definition of Responsible Gambling refers to policies and practices designed to prevent and reduce potential harms associated with gambling.

To that end, The New York Council on Problem Gambling recommends that:

a. A clear set of policies and practices on Problem Gambling exist at each gaming facility
b. These policies and practices should include a focus on the 8 areas addressed in this BP Manual and when possible address incorporating safeguards into game features and advertising
c. The RG policies and practices be informed by current research and Best Practices
d. RG policies are written and accessible to all staff, patrons and the public
e. RG policies and practices should be reviewed regularly with all gaming facility staff, at minimum twice per year
f. An Executive level staff person at the gaming facility is responsible for the RG program
g. The overall program is evaluated for effectiveness in reducing Problem Gambling and Underage Gambling incidence at the facility
h. The overall RG program is reviewed by Executive staff or an RG Committee annually and necessary improvements and revisions are made

Once these policies and practices are developed and written, multiple modes for sharing them should be utilized including Responsible Gambling brochures, posting them to the gaming facility website, including them in the employee training, employee handbook and periodically featuring them in the gaming facility newsletter.

Responsible Gambling policies and programs should target all patrons at the facility, including infrequent social gamblers, regular patrons and patrons who may be experiencing problems. The
program should address all patrons generally through information and messaging and target those who are at-risk through enforcement efforts, customer assistance, and by providing direct linkages to Problem Gambling specific support services. Specific recommendations in each area are outlined in the following sections.
2. Underage Gambling Policies and Practices - *The facility prohibits Underage Gambling and focuses efforts on preventing youth access to the gaming floor.*

**Example Policy** – Persons under the age of eighteen are prohibited from gambling, or traversing the gaming floor. Underage persons may traverse the gaming floor utilizing pathways that have been specifically excluded from the gaming floor, with an adult over the age of 18 and a security escort.

Some people are considerably more prone to gambling addiction than other people including young adults. Adolescents may be neurologically more vulnerable to addictive products, such as gambling, compared to adults. Therefore preventing youth gambling is an important effort.

To that end, The New York Council on Problem Gambling recommends that:

a. Prominently posted signs with an Underage Gambling related message are posted at the entrances to the facility and within a reasonable distance to all entrances to the gaming floor
b. A palm or brochure on Underage Gambling should be available facility wide
c. All staff not just security have a responsibility to identify underage gamblers and report them to security
d. Security is posted at all entrances to the gaming floor and required to ID anyone who appears to be under the age of 18
e. A system is in place for logging underage individuals who attempt to enter the gaming floor
f. ID card readers or scanners should be utilized
g. If a patron is under the legal gambling age they will not be allowed on the gaming floor for any reason
h. If an underage person is identified on the gaming floor they will be immediately removed from the gaming floor and a clear plan of action that involves reporting it to their parents or the local authorities is in place
i. Parking lot surveillance should be utilized to ensure that unattended minors are not on the premises

Young adults inherently have the highest rates of ‘at-risk’ behavior therefore, delaying exposure to gambling activities for as long as possible can reduce the rates of developing problems (Williams, et.al, 2012). Currently research on brain development shows that the adolescent brain is not fully developed for skills such as higher level decision making until the age of 24, therefore increasing the legal age for gambling would be beneficial to minimizing gambling-related harm.
3. Self-Exclusion Programs- A well managed and communicated self-exclusion program is in place that facilitates access to counseling and other supports.

Example Policy: The facility will offer a self-exclusion program that allows patrons to remove themselves from gambling at the gaming facility and which focuses on offering self-excluded patrons help and support.

Self-exclusion is a tool to help people in their efforts to overcome gambling problems. While the current and predominant model of self-exclusion today continues to be primarily based on enforcement, casinos are beginning to move toward an assistance model. A model based on delivering individual assistance involves responding to individuals in a helpful way, working through the registration process in a respectful timely manner; providing information about counseling options including financial, self-help and treatment referrals and encouraging individuals to take advantage of the assistance available (Responsible Gambling Council, 2008).

To that end, The New York Council on Problem Gambling recommends that:

a. Self-exclusion programs are well advertised onsite at the gaming facility and explained through informational palm cards or other take-away materials, as well as on the gaming facility website where registration forms can be downloaded
b. All staff are aware of the self-exclusion program and can assist patrons looking for further information or interested in registering
c. Gaming facilities select and train specific staff to handle the self-exclusion registration process. Staff must be able to provide responsive, respectful and professional service
d. The self-exclusion registration process should be carried out in a comfortable setting
e. Staff clearly explains the registration process, options, breach consequences and follow up procedures
f. Support options are clearly explained and written materials to take home and view in a less pressured environment are provided (See Appendix C)
g. During the individual’s ban period they are removed from all marketing systems and are no longer able to accumulate Player’s Club points or other benefits
h. A player tracking system is utilized and self-excluded patrons are flagged across all systems including marketing, security, Player’s Club, cage and customer service areas
i. Excluded patrons should not be allowed on the premises for any reason including entertainment events, use of restaurants, etc.
j. There is a strong enforcement process in place at the gaming facility that includes the use of facial recognition technology when possible
k. There are clear policies and procedures for handling self-exclusion violations
I. Self-excluded individuals should not be able to request a reinstatement prior to the expiration of their exclusion period

m. Once the exclusion period has expired, reinstatement is not automatic and the individual must initiate the reinstatement process

n. The reinstatement process should require the individual complete an education program on Problem Gambling and provide proof of completion with their request letter for reinstatement

o. Additionally a mandatory meeting should take place at the end of the exclusion time period, including an evaluation of the self-excluder’s gambling situation, information about chance and Responsible Gambling, and referrals to additional resources, if needed. The self-exclusion period continues if the mandatory meeting is not attended

p. Once the individual has been reinstated being added back on marketing and email lists is not automatic and the patron must specifically request a return to all promotions and communications

It is of note that internationally there has been a shift in allowing individuals to register for self-exclusion at multiple access points such as treatment providers’ offices, regulators offices, resource centers or even by mail. This is a positive step in making self-exclusion a more user friendly program.

The change from an enforcement only model to individual assistance model requires more effort on the part of casino staff such as security, who are already focused on several other issues. The Council suggests that this process may be better served through an onsite Responsible Gambling Resource Center (RGRC) where individuals can relax, take a break from gambling, educate themselves and reach out for assistance if needed. More information on RGRCs is available at http://www.rgrc.org/en or through discussion with NYCPG staff.
4. Information and Messaging - Information on Responsible Gambling and Problem Gambling is up to date and readily available to patrons.

Example Policy - Information on Problem Gambling, Responsible Gambling, Self-Exclusion, Underage Gambling and the 24 Hour HOPEline will be available to patrons onsite. To the greatest extent possible all policy and educational measures will align with this messaging so as not to negate any intended positive impact.

Evidence from research in the field of substance abuse prevention indicates that increasing knowledge and awareness alone is not sufficient to change behavior. Providing information and resources to patrons, however, as part of a larger Responsible Gambling program is necessary and casinos should be guided by the principle that it is their obligation to establish information and support links.

To that end, The New York Council on Problem Gambling recommends that:

a. Underage Gambling signs are posted throughout the gaming facility
b. Responsible Gambling Signs which include the 24 Hour HOPEline number are posted throughout the gaming facility
c. Signs are conspicuously posted
d. At minimum signs are posted at entrances and exits, Security podiums and office(s), Player’s Club booths and kiosks, the Cashier cage and either on ATM machines or on the wall directly behind where ATM machines are located
e. Signs are posted in multiple languages
f. Signs are large enough to be easily read at a distance
g. Wall posters, back lit displays and or electronic signs include RG messages
h. Brochures, palm cards or other take-away materials are available on Responsible Gambling, Problem Gambling, Underage Gambling, and the self-exclusion program
i. Brochures should be prominently displayed (not placed behind other pamphlets) in brochure holders and available at multiple locations including Security podiums and office, Player’s Club booths and kiosks, the Cashier cage and near ATM machines
j. An RG message is on all electronic and print communication including email marketing, website, etc.
k. Posted signs on Problem Gambling including the 24 hour HOPEline number and Gamblers Anonymous resources are posted “back of the house” for employees
l. Other outreach efforts on RG take place at the facility such as tabling events, health fairs, RG specific emails, mailers, posting to social media sites, etc.
It is important that Responsible Gambling information and messaging not be overshadowed by advertising and promotion of the gambling itself. While advertising and promotion are important to fulfilling the casino’s economic mandates, it is essential that social responsibility and high standards are maintained by following a Code of Advertising Standards such as those set by the Nova Scotia Gaming Corporation. A sampling of these standards is below.

- Advertising and marketing campaigns and / or materials must not:
  - Imply exaggerated chances of winning;
  - Encourage gambling beyond one’s means;
  - Explicitly imply that financial rewards are a likely outcome of gambling;
  - Portray gambling as an alternative to employment or as a financial investment;
  - Suggest that gambling longer will increase the chances to win;
  - Suggest that skill can influence the outcome of purely random games of chance;
  - Suggest that using playing systems or “lucky” icons can influence the outcome of games;
  - Imply inferiority or unpopularity for not taking part in, or losing at, any game of chance;
  - Contain endorsements by well-known personalities that suggests playing games of chance contributed to their success;
  - Focus unduly on the possibility of benefits accrued to players based on their volume of gambling activity; and,
  - Perpetuate myths that are commonly associated with gambling.

- Advertising and marketing of gambling products must never be targeted towards children and must not:
  - Appear in any media where the primary target audience is under the age of majority;
  - Appear at venues where the primary audience is reasonably expected to be minors;
  - Be based on themes, or use language intended to appeal to minors;
  - Appear during television, radio programming and / or on websites where the primary audience is expected to be minors; and,
  - Contain child-focused cartoon figures or themes, or use celebrity endorsements whose primary appeal is to minors.

- Product advertising, marketing campaigns and / or materials must include a visual message regarding the legal age of play.

- Billboard advertising must not be placed at sites that are adjacent to primary or secondary schools.

- Minors, or persons who appear to be minors, must not be used to promote gambling in advertising or marketing materials.

- Actors appearing in advertising and marketing materials must appear to be 25 years of age or older.

-Nova Scotia Gaming Corporation, 2011

NEW YORK COUNCIL ON PROBLEM GAMBLING, INC.
5. Informed Decision Making- Facility provides substantial and readily available information to enable patrons to make informed decisions.

Example Policy- Information and resources will be onsite at the casino to assist patrons in making informed decisions about their gambling. This information will be provided to patrons with the expectation that better, more complete, information will promote better decisions.

Across Canada, governments and gaming providers have recognized the importance of giving patrons information to make informed decisions about their gambling. These topics include how gambling works, tips on managing play, factors that increase risk and help resources for Problem Gambling (Responsible Gambling Centre, 2010). In Canada where there are considerable resources dedicated to this issue modes of information delivery vary including pamphlets, brochures, television or radio commercials, posters and on-site information centers.

In New York Informed Decision Making has yet to be prioritized. Initially programs should be put in place to educate the general casino population of “Casual Gamblers”. The focus should be on promoting basic gambling literacy and should include information on how gambling works, gambling safeguards, risk factors and help available. Messages need to be rotated and replaced on a regular basis to ensure the communications are fresh. Links to further resources, such as the American Gaming Association brochures on odds (http://www.americangaming.org/odds) should also be provided for those who want more detailed information.

“Gambling, like many activities, comes with risks. Gamblers like the consumers of any product, have the responsibility to assess the benefits and risks involved in this pastime. For their part, gaming providers have a responsibility to ensure that players have the information they need to make decisions and to minimize the risk that their patrons will lose control of their gambling”.

Responsible Gambling Centre Center for the Advancement of Best Practices, 2010

To that end, The New York Council on Problem Gambling recommends that:

a. The facility has policies and procedures related to informed decision making, which promote gambling literacy (i.e. basic, general information about the fundamental aspects of how gambling works and key safeguards all gamblers should know, risk factors, and help availability)

b. Brochures on Informed Decision Making are available throughout the facility
c. Brochures should be prominently displayed (not placed behind other pamphlets) in brochure holders and available at multiple locations including Security podiums and office(s), Player’s Club booths and kiosks, the Cashier cage and near ATM machines.

d. Information minimally includes how gambling works, gambling safeguards, risk factors and help available.

e. Informed Decision Making messaging such as Know The Odds, should be included in email marketing and electronic signage.

f. At information awareness/tabling events Informed Decision Making activities and information are featured.

g. When possible staff should be available to further explain how the VLT machines work, odds, and myths and facts about gambling.

h. The facility provides patrons access to information about their play.

i. Beginning to include Informed Decision Making information requires more effort on the part of casino staff, which is already focused on several other issues. As was referenced in the previous section on Self-Exclusion, The Council suggests that this process may be better served through an onsite Responsible Gambling Resource Center (RGRC) where individuals can relax, take a break from gambling, educate themselves and reach out for assistance if needed. When appropriate RGRC staff can also participate in tabling event or other education opportunities.

Moving beyond the initial step of focusing on the general casino patron population there should also be a focus on educating the frequent gambler and intensive gambler. The objective for the frequent gambler is to promote self-awareness of one’s gambling and for the intensive gambler to provide cautionary information and to raise awareness of options to reduce risk (Responsible Gambling Center, 2010).
6. Assisting Patrons Who May Have Problems with Gambling - Assistance to patrons who may have problems with gambling is readily available and systematically provided.

Example Policy - To the extent that the patron is willing to receive information, the facility 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 is both proactive and responsive.

A compulsive gambler may beg for money, harass staff, and disturb other patrons in addition to suffering their own personal, financial and social consequences. An individual with a gambling problem should not be at a casino or any other gambling establishment. For their own protection as well as that of other patrons individuals with a gambling problem should be offered assistance and removed from the facility if necessary.

“The patron interaction process has been in transition for many years from a ‘look the other way’ model to an individual response and assistance model. This shift is widely supported by those with gambling problems, gaming operators, and specialists in Problem Gambling.”

- Responsible Gambling Center Centre for the Advancement of
  Best Practices, 2011

Casino staffs 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, The New York Council on Problem Gambling recommends that:

a. Clear policies are in place for assessing and assisting a patron who may have a gambling problem
b. All staff are aware of the policies and procedures for assisting patrons
c. All staff is knowledgeable about the helpline and self-exclusion and are able to direct patrons seeking information
d. Designated staff initiates discreet discussions with patrons who show patterns or behaviors that may be signs of a gambling problem
e. Designated staff can provide assistance in a comfortable setting
f. 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 (See Appendix C)
g. If the patron is interested and willing a direct connection is made with the appropriate local resource
Once again, this role could be filled by a Problem Gambling specialist at an onsite Responsible Gambling Resource Center (RGRC) where individuals can take a break from gambling, educate themselves on support options and talk to someone who can provide assistance.
7. Access to Money—Money and money services are provided to patrons in a responsible manner that does not encourage excessive spending.

Example Policy—Access to money within the gaming facility will be limited by 1) the ways that funds can be accessed, 2) the number of machines or cashiers that can provide cash, 3) the proximity of options to get cash to the gaming floor and 4) by imposing a maximum daily amount that can be accessed. These limitations will be set with the intention of protecting individual patrons who may have a gambling problem.

The effective prevention of harm associated with potentially dangerous products or activities has always required some inconvenience to the general public or loss of revenue. Effective prevention of Problem Gambling includes making policies that effect environmental changes that thereby reduce the availability or access to the means to gamble. Examples include reducing hours of operation, restricting the placement of VLTs in only gambling venues, restricting gambling venue access to residents, or drastically limiting the number of gambling venues available (Williams, et.al., 2012). Many of these are public policies set by government laws and regulations.

However, one such environmental policy that can to an extent be controlled by the casino is the accessibility of money. Research findings suggest that policies to restrict immediate access to cash are potentially effective approaches in reducing the degree to which gamblers exceed financial limits.

To that end, The New York Council on Problem Gambling recommends that:

a. Access to credit is prohibited
b. The cashing of any check except personal check be prohibited
c. The cashing of any check payable to an individual including Social Security, unemployment insurance, disability payment, public assistance or payroll check be prohibited
d. Access to money directly at electronic gaming machines is prohibited
e. The facility imposes its own additional limit on daily fund access (this is above and beyond or regardless of the individual’s ATM, bank, or third party limitations)
f. A reasonable number of ATM machines are in place
g. ATM machines are available but not advertised in such a way as to encourage withdrawal or excessive spending
h. ATM machines are not located on the gaming floor

Additionally, access to money may be especially significant when considering that gamblers are often in “hot” states as they approach their limits, this creates vulnerability to impulsive gambling leading to money losses they cannot afford (Williams, et.al., 2012). Creating a time buffer between the impulse and the action creates a “cool down” period. With this in mind, ideally ATM machines would be located
as far from the gambling activity as possible, in some instances this may necessitate that machines be placed outside of the facility.
8. **Employee Training** - *Staff understands the importance of RG and is knowledgeable about their role and the corporation’s expectations of their actions.*

**Example Policy** – All casino employees are required to complete training on Responsible Gambling and Problem Gambling. Training will be provided upon initial hiring and periodic refresher training will be required. An evaluation process is in place that measures the individual employee’s increase in knowledge and readiness to provide assistance.

Casino employees whether floor staff, Security, or Executive level staff members play an important role in any RG program. Not only does staff provide assistance to those who seek them out, but they can be a resource to patrons who are interested in learning more about Responsible Gambling in general. Providing employees training on Problem Gambling allows them to provide better customer service. Floor staff can often be the first to see the signs of a gambling problem and therefore are key impactors helping those in need get assistance.

To that end, The New York Council on Problem Gambling recommends that:

a. All new employees be educated on Responsible Gambling and Problem Gambling

b. Periodic refresher training be provided to floor staff and Executive level staff

c. The gaming facility implements communications programs for employees to improve their understanding of Responsible Gambling and related policies and procedures

d. Information on Responsible Gambling awareness including the HOPEline number will be posted in various places where employees congregate

e. The training objectives are clear to the learners

f. The training includes 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 should the employee intervene if they decide to do so? (Blaszczynski, et.al., 2004)

g. Staff are taught skills and procedures required of them for assisting patrons who may have problems with gambling

h. There is a verification process in place to ensure staff complete the training

i. There is an evaluation process in place to measure the effectiveness of the training program
Research has shown that providing a training workshop that includes the information listed above led to retailers developing a better understanding of Problem Gambling, they felt more capable of effectively intervening among excessive gamblers and choosing the most appropriate moment to do so. At follow-up, retailers who had attended the workshop reported that they approached a problem gambler significantly more often than the retailers who had not attended the workshop, and had discussed how to help problem gamblers significantly more often (Blaszczynski, et.al., 2004).

A review of existing research Allack, et. al (2002) highlighted a number of behavioral indicators which may be helpful in identifying problems and concluded that the most consistent sign of Problem Gambling was daily out of pocket loss. Other strong indicators were repeated agitation after each loss; repeated cash withdrawals, borrowing or attempts to cash checks; playing until all funds are exhausted and complaining of lack of money; and excessive frequency and prolonged duration of gambling session.

Additionally Schellink and Schrans (2004) asked video lottery players, including those with gambling problems, to complete a check list of items that consisted of behavioral, emotional, and physiological symptoms they experienced. Some of the observable symptoms that were more likely to be reported by players with problems were sickness or nausea, sadness or depression, three or more hours of gambling, money-borrowing, shaking while gambling, sweating and nervousness or edginess.

The New York Council on Problem Gambling has developed a training that encompasses the information described above and will deliver the training via face to face and online options. To review a printed copy of this training please see Appendix A. Please note that this training will include additional audio recorded information when delivered online.
III. Future Efforts

Ongoing efforts in the area of Responsible Gambling are a necessary part of a casino’s social responsibility and commitment to providing the community with the safest form of entertainment possible for community residents. Working with the New York Council on Problem Gambling to assess current practices and to develop plans for improvement is a historic step in collaborating on this mutual goal. NYCPG stands ready to work with NYGA gaming facilities to implement the recommendations in this manual and proposes that future and ongoing collaboration takes place to address the following:

- Develop additional employee trainings including a refresher training, trainings that focus on educating specific employee sectors i.e. Security, staff designated to assist patrons, Executive level staff, etc. and make them available both face to face and online
- Develop and offer improved training formats such as webinar or interactive online options
- Develop training videos specific to casino employees in NYS that can be utilized at annual Responsible Gambling week events or periodic training sessions
- Continue to offer new information and relevant services through the NYRGHUB
- Provide support to NYGA member facilities for onsite health fairs or other informational events
- Conduct an annual site visit for reviewing Responsible Gambling policies and practices and work with NYGA members to make continued program improvements
IV. References


V. Appendices

Appendix A: Problem and Responsible Gambling Training for Casino Employees

Responsible and Problem Gambling for Casino Employees

Presented by:
New York Council on Problem Gambling, Inc.

This PowerPoint training also includes audio that expands on the points listed on some slides. The audio can be played by scrolling over the **audio symbol** and clicking the **“play” symbol**, as shown below.

In order to hear the audio, please be sure that your computer has speakers and the volume is turned up.
The New York Council on Problem Gambling is a not-for-profit independent corporation dedicated to increasing public awareness about problem and compulsive gambling and advocating for support services and treatment for persons adversely affected by gambling.

*The Council maintains a neutral stance on gambling.*

**Gambling Opportunities in NYS**

- Horse Racing at Race Tracks and OTBs
- Casinos and VLT’s
- Lottery
- Internet Gambling
- Bingo
- Pull Tabs

- Cards for Money
- Dice
- Sports Betting
- Office Pools
- 50/50 Raffles

*OTHER – Stock market, dog fighting, cock fighting*
What is chance and randomness in gambling?

- Chance: Although some games involve skill, all forms of gambling ultimately involve some level of chance.

- Randomness: Random events fool people into believing they can predict outcomes

A WIN IS NEVER GUARANTEED

Is there a link between misunderstanding the concept of chance and excessive gambling?

“If individuals with a gambling problem still believe that they can beat the odds, the odds are they will try again.”

“... exploring these beliefs can be an important aid in helping the client understand their gambling experiences—both their wins and their losses. Correcting these beliefs may also help in relapse prevention.”

(http://www.problemgambling.ca/EN/Documents/HPG%20Probability%20Final.pdf)
Types of Gamblers

- **Social Gambler** - Gambles for entertainment and a little excitement. Dedicates small amounts of leisure time and gambling is not given excessive emphasis.
- **Problem Gambler** - Dedicates more time, thoughts and money towards gambling.
- **Pathological (Compulsive) Gambler** - Uncontrollable preoccupation and urges to gamble. Gambling is the most important thing in their life.

Gambling in the US

- Approximately 85% of U.S. adults have gambled at least once in their lives; 60% in the past year.
- 4-6 million (2-3%) will have a gambling problem in any given year.
- An additional 2 million (1%) of U.S. adults are estimated to meet criteria for pathological gambling in a given year.

Problem Gambling

Problem gambling is gambling behavior which causes disruptions in any major area of life: psychological, physical, social or vocational.

*The term "Problem Gambling" includes, but is not limited to, the condition known as "Pathological" or "Compulsive" Gambling or "Gambling Disorder."

Source: NCPG

DSM-V Criteria for Gambling Disorder

A. Persistent and recurrent problematic gambling behavior leading to clinically significant impairment or distress, as indicated by the individual exhibiting four (or more) of the following in a 12-month period:

1. Tolerance - Needs to gamble with increasing amounts of money in order to achieve the desired excitement.
2. Withdrawal - is restless or irritable when attempting to cut down or stop gambling
3. Preoccupation - has persistent thoughts of reliving past gambling experiences, handicapping or planning next venture, thinking of ways to get money with which to gamble
4. Escape - Gambles when feeling distress (e.g., helpless, guilty, anxious, depressed)
5. Chasing - After losing money gambling, often returns another day to get even (“chasing” one’s losses)
6. Lying - Lies to family, friends and others to conceal the extent of involvement with gambling
7. Risks Relationships/Opportunities - Has jeopardized or lost a significant relationship, job, or educational career opportunity because of gambling
8. Bailout - Relies on others to provide money to relieve desperate financial situations caused by gambling
9. Loss of Control - Falls in an effort to control or stop gambling

B. The gambling behavior is not better explained by a manic episode.
### Social and Recreational Gamblers vs. Problem and Pathological Gamblers

<table>
<thead>
<tr>
<th>Social and Recreational Gamblers</th>
<th>Problem and Pathological Gamblers</th>
</tr>
</thead>
<tbody>
<tr>
<td>Gambles for entertainment</td>
<td>NEEDS to gamble</td>
</tr>
<tr>
<td></td>
<td>Experiences negative consequences due to gambling</td>
</tr>
<tr>
<td>Sets limits on time and money</td>
<td>Spends increasing amount of time gambling</td>
</tr>
<tr>
<td></td>
<td>Uses money that’s needed for something else or borrowed</td>
</tr>
<tr>
<td>Realistic expectations – hopes to win, expects to lose</td>
<td>Irrational thoughts – always expects to win</td>
</tr>
<tr>
<td>Walks away from losses</td>
<td>“Chases” losses – returns to “get even”</td>
</tr>
</tbody>
</table>

### Phases of Gambling Addiction and Recovery

- **Winning Phase**
  - Losing Phase
  - Desperation Phase
  - Hopelessness Phase
- **Growth Phase**
  - Rebuilding Phase
  - Critical Phase
Different Populations
Different Gambling Patterns
Different Risks

Women
- Reasons for Gambling
  - Escape
  - Avoidance
- Risk Factors
  - Pre-existing mental health vulnerabilities
  - Increased responsibilities at home
  - Often neglect own needs

Senior Citizens
- Reasons for Gambling
  - Boredom
  - Socialization
  - Escape
  - Physical limitations
- Risk Factors
  - Organized Recreation
  - Limited Financial Resources
  - Deserve to Have Fun
  - Extra Time
  - Emotional Escape
Youth Prevalence Rates

- Approximately 68% of youth between the ages of 14 and 21 have gambled in the last year
- 11% report having gambled twice a week or more
- 2.1% already meet the criteria for problem gambling
- 6.5% of those youth are in the category of at-risk or problem gambling

*Youth involvement in gambling is believed to be greater than their use of tobacco, hard liquor, and marijuana.*


Underage Gamblers

**REASONS**
Entertainment, Excitement, Socialization, Boredom

**RISK FACTORS**
Why are they more at-risk for developing a problem with gambling?

Answer: Brain Development
Brain Development

- Youth is a period of profound brain maturation.
- The maturation process is not complete until about age 24
- "Normal" youth brains
  - Greater risk taking
  - Desire for low effort-high excitement activities
  - Lower capacity for good judgment and weighing consequences
  - Greater sensitivity to novel stimuli

Youth are actually more likely to become **pathological gamblers** than are adults.

Effects of Problem Gambling

Individual and Relational Impact

PROBLEMS:
- Financial
- Legal
- Relationship
- School/Work
- Physical and Mental Health
  - Specifically co-occurring disorders such as depression, anxiety, substance abuse
  - Suicide

CONSEQUENCES for the Family:
- Unmet needs
- Domestic Violence
- Child Abuse
- Mental Health Issues
- Stealing
- Loss of productivity

*It is estimated that each pathological gambler affects between 5 and 10 other people, including family, friends, co-workers, etc.


Community and Economic Impact

- Compulsive gamblers engage in $1.3 billion worth of insurance fraud each year.
- Bankruptcy costs are 18% higher in casino communities.
- 15% of pathological gamblers have collected unemployment benefits at some point during the last 12 months.

The NORC study (1999) found that pathological and problem gamblers in the United States cost society approximately $5 billion per year and an additional $40 billion in lifetime costs for productivity reductions, social services, and creditor losses.
Why should casinos have RG programs?

- Mandated by the NYS Gaming Commission
- For the protection of patrons with and without gambling problems
- The casino has an obligation to be socially responsible and a good corporate citizen

“The approach is not to prohibit gambling, but to put into place programs to minimize the negative impact gambling will have on those who are unable to gamble with control.”

NCPG, 2014

Responsible Gambling (RG) Program Areas

- Responsible Gambling Policies
- Underage Gambling Policies and Practices
- Self Exclusion Programs
- Information and Messaging
- Informed Decision Making
- Assisting Patrons who May Have Problems with Gambling
- Access to Money
- Employee Training
Underage Gambling Policies and Practices

- Gambling under the age of 18 is prohibited.
- Those under the age of 24 are neurologically more at risk of developing a gambling problem, than the general population.
- Research shows that the older a person is when they start participating in an “at-risk” behavior, the less likely they are to develop a problem.
- Everyone who appears to be under the age of 30 should be asked for ID.

Self-Exclusion Programs (SEP)

SEP allows problem gamblers to remove themselves from a gaming facility, marketing programs, and from access to the Player’s Club.

1. Participants must register for self exclusion. Registration is usually completed with Security.
2. They are given information on the exclusion process, protocols, etc.
3. During the exclusion period, they are not allowed on the premises and if they are found, will be removed and will forfeit any winnings.
4. Following the exclusion period, the participant must go through a reinstatement process that typically involves a request for reinstatement.
Information and Messaging

- Brochures, palm cards, posters, etc.
- Located near entrances/exits, security podiums/offices, Players Club kiosks
- Includes the 24-Hour HOPEline number

Assisting Patrons Who May Have a Problem with Gambling

- For their own protection and that of other patrons, individuals with a gambling problem should be offered assistance and removed from the facility if necessary.
- All gaming facilities have their own protocols that determine how patrons who are suspected to have a gambling problem are assisted.
- Be sure to understand specifically what your supervisor wants you to do in these situations
Access to Money

- Restricting immediate access to money decreases the degree to which gamblers exceed their financial limits
- Includes:
  - Limiting physical access to ATM’s
  - Limiting check cashing options
  - Limiting access to daily funds
- Increasing the time between a problem gambler’s “hot state” and access to their money allows them time to calm down and rethink their decision to increase their spending

Warning Signs on the Casino Floor... When to Be Concerned

<table>
<thead>
<tr>
<th>Behavioral Signs</th>
<th>Physiological Signs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Increased agitation after each loss</td>
<td>Sickness or nausea</td>
</tr>
<tr>
<td>Excessive frequency and prolonged duration of each</td>
<td>Sadness or depression</td>
</tr>
<tr>
<td>gambling session</td>
<td>Shaking while gambling</td>
</tr>
<tr>
<td>Repeated cash withdrawals</td>
<td>Sweating</td>
</tr>
<tr>
<td>Borrowing money</td>
<td>Nervousness/Edginess</td>
</tr>
<tr>
<td>Cashing checks</td>
<td></td>
</tr>
<tr>
<td>Playing until funds are exhausted</td>
<td></td>
</tr>
<tr>
<td>Complaining about not having any money</td>
<td></td>
</tr>
</tbody>
</table>

Sources: Allcott, et. al. (2008) and Schellink & Schmans (2004)
Bet The House: 3 Stories About Problem Gambling

Vignette #3 Marsha H.

1-877-8-HOPENY
Find Help for Alcoholism, Drug Abuse, Problem Gambling
Resources

- New York Council on Problem Gambling Resources
  - NYCPG [www.nyproblemgambling.org](http://www.nyproblemgambling.org)
  - Videos can be found at [www.nyproblemgambling.org/resources/videos](http://www.nyproblemgambling.org/resources/videos)
  - NYRG Hub [www.NYRGHub.com](http://www.NYRGHub.com)
  - Know the Odds [www.knowtheodds.com](http://www.knowtheodds.com)
  - NYS Gambling Support and Treatment Centers [http://knowtheodds.org/gambling-support-directory](http://knowtheodds.org/gambling-support-directory)
- OASAS [www.oasas.ny.gov/gambling](http://www.oasas.ny.gov/gambling)
- Gamblers Anonymous [www.gamblersanonymous.org](http://www.gamblersanonymous.org)
- Gam-Anon [www.gam-anon.org](http://www.gam-anon.org)
- Your First Step to Change – Self Assessment Tool and Resource [http://s96539219.onlinehome.us/toolkits/FirstStepSite/main_intro.htm](http://s96539219.onlinehome.us/toolkits/FirstStepSite/main_intro.htm)
Appendix B: New York Responsible Gambling Hub (NYRG Hub)

Coming March 1, 2014
www.NYRGHUB.org

In an effort to regularly communicate with NYGA member facilities and their staff, NYCPG is developing the New York Responsible Gambling Hub. This web-based hub will serve as a Problem and Responsible Gambling research and resource directory and up to date news directory. In addition, at this website NYGA members will be able to download available brochures and other print materials on Responsible Gambling. This resource Hub will also directly link NYGA members and their employees to the online registration process for the Problem and Responsible Gambling Training for Casino Employees.
Appendix C: NYCPG Know the Odds Resource Kit

The New York Council on Problem Gambling has developed a resource tool for NYS casinos to utilize in assisting patrons with a gambling problem or with those interested in self-exclusion. This resource kit includes three informational booklets, a DVD and resource directory brochure. This material provides individuals seeking help and recovery, more information on Problem Gambling. The Know the Odds Resource Kit has been produced and is ready for use by NYGA Gaming Facilities.

A copy of the NYCPG Know the Odds Resource Kit has been enclosed for your review. The kit should contain:

KTO Resource Book 1: Understanding Problem Gambling
KTO Resource Book 2: The Faces of Problem Gambling
KTO Resource Book 3: Staying Safe After Problem Gambling
KTO DVD: Bet the House
Resource Directory Brochure: If You Are Looking for Support for a Gambling Problem

To request copies of the Resource Kit be shipped to your facility please contact the New York Council on Problem Gambling directly.