



MASSACHUSETTS GAMING COMMISSION  
PUBLIC MEETING #217

May 25, 2017

11:00 a.m.

**MassMutual Center**

1277 Main Street – Meeting Rooms 1 & 2  
Springfield, MA



Massachusetts Gaming Commission



**NOTICE OF MEETING and AGENDA  
May 25, 2017**

Pursuant to the Massachusetts Open Meeting Law, G.L. c. 30A, §§ 18-25, notice is hereby given of a meeting of the Massachusetts Gaming Commission. The meeting will take place:

**Thursday, May 25, 2017  
11:00 a.m.  
MassMutual Center  
1277 Main Street, Rooms 1 and 2  
Springfield, MA**

**PUBLIC MEETING - #217**

1. Call to order
2. Approval of Minutes
  - a. May 10, 2017 – VOTE
3. Ombudsman – John Ziemba
  - a. MGM Quarterly Report
  - b. Mitigation Fund Grant Request – City of Medford – VOTE
  - c. Race Horse Development Fund Legislative Update – A. Lightbown, Director of Racing
4. Workforce, Supplier and Diversity Development – Jill Griffin, Director
  - a. 2017 MGM Operations Workforce Development Plan – VOTE
  - b. Massachusetts Casino Careers Training Institute Update from President Christina Royal, Holyoke Community College and President John Cook, Springfield Technical Community College
  - c. Gaming Economic Development Fund Introduction – B. Stebbins, Commissioner
5. Administrative Update – Ed Bedrosian, Executive Director
  - a. General Update
  - b. Gaming Service Employee Registration Review Continued – C. Blue, General Counsel and K. Wells, Director – Investigations and Enforcement Bureau
  - c. Player Card Monthly Statements



**Massachusetts Gaming Commission**

6. Commissioner's Updates

7. Other business – reserved for matters the Chair did not reasonably anticipate at the time of posting.

I certify that on this date, this Notice was posted as “Massachusetts Gaming Commission Meeting” at [www.massgaming.com](http://www.massgaming.com) and emailed to: [regs@sec.state.ma.us](mailto:regs@sec.state.ma.us), [melissa.andrade@state.ma.us](mailto:melissa.andrade@state.ma.us).

5/22/17  
DATE

  
Enrique Zuniga, Commissioner

**Date Posted to Website:** May 23, 2017 at 10:00 a.m.



Massachusetts Gaming Commission

101 Federal Street, 12<sup>th</sup> Floor, Boston, Massachusetts 02110 | TEL 617.979.8400 | FAX 617.725.0258 | [www.massgaming.com](http://www.massgaming.com)



---

## Massachusetts Gaming Commission Meeting Minutes

---

**Date/Time:** May 10, 2017 – 10:00 a.m.

**Place:** Massachusetts Gaming Commission  
101 Federal Street, 12<sup>th</sup> Floor  
Boston, Massachusetts

**Present:** Chairman Stephen P. Crosby (via telephone)  
Commissioner Lloyd Macdonald  
Commissioner Bruce Stebbins  
Commissioner Enrique Zuniga

**Absent:** Commissioner Gayle Cameron

**Time entries are linked to  
corresponding section in  
Commission meeting video**

### **Call to Order**

See transcript pages 2-3

10:00 a.m. Commissioner Stebbins called to order the 216<sup>th</sup> Commission meeting. Chairman Crosby participated remotely due to personal illness. Chairman Crosby stated that he could hear Commissioner Stebbins and Commissioner Stebbins stated that he could hear Chairman Crosby. Commissioner Stebbins noted that Commissioner Cameron and Executive Director Bedrosian are absent due to work travel.

### **Approval of Minutes**

See transcript pages 3-4

10:01 a.m. *Commissioner Macdonald moved for the approval of the April 27, 2017, Commission meeting minutes subject to any corrections, typographical errors, or nonmaterial matters. Motion seconded by Commissioner Zuniga. Roll call vote: Commissioner Macdonald – Aye, Commissioner Zuniga – Aye, Chairman Crosby – Aye, and Commissioner Stebbins – Aye. Motion passed unanimously.*



## **Administrative Update**

See transcript page 4

[10:02 a.m.](#) Karen Wells, Director of the Investigations and Enforcement Bureau, stated that she was filling in for Executive Director Edward Bedrosian and he has no updates to report.

## **Research and Responsible Gaming**

See transcript pages 4-47

[10:02 a.m.](#) Director Mark Vander Linden stated that the Donahue Institute, at the University of Massachusetts, is a key member of the SEIGMA (Social and Economic Impacts of Gaming in Massachusetts) team. He stated that the institute will present today on a study of employees at Plainridge Park Casino hired during the first two years of operations.

[10:04 a.m.](#) Dr. Mark Melnik, Director of the Economic and Public Policy Research Group at the UMass Donahue Institute and the Co-Principal Investigator on the SEIGMA project, provided an overview of the SEIGMA project which included the Expanded Gaming Act research requirements and activities. He also presented on the Plainridge Park Casino New Employee Survey which included the following: purpose of survey, new employee definition, licensing process, data collected, and linkage to other employee data. Dr. Melnik also provided highlights of the survey which included: over 1000 new employees were surveyed, approximately half were unemployed or worked part-time at the time of hire, most sought employment to advance careers and pay, and most did not receive pre-employment training. The survey also included frequency of hiring, work status prior to hire, reasons for seeking employment, previous gaming work experience, origins of new employees, and training. He noted summary findings and next steps which included: survey revisions, linking results with other data, and beginning data collection from resort casinos. He stated that the survey results revealed good news but there is absent data on who is turning over and why.

[10:41 a.m.](#) The Commission took a brief recess due to technical difficulties with live streaming of the Commission meeting.

[10:44 a.m.](#) The meeting resumed. Commissioner Stebbins noted that several state agencies were having technical difficulties. He also noted that a film and transcript of the meeting will be available.

## **Ombudsman**

See transcript pages 47-109

[10:53 a.m.](#) Ombudsman John Ziemba requested to join agenda item 6a (Diversity Recognition Program) with agenda item 5a (Wynn Boston Harbor Quarterly Report).

[10:54 a.m.](#) Robert De Salvio, President of Wynn Boston Harbor, introduced the Wynn team and stated that there is a lot of advancement on the site.

Chris Gordon, President of Wynn Design Development MA, provided a construction update which included the following: Permitting (Notice of Project

Change, Chapter 91 modifications, dredging, federal permits and local permits); Construction (photographs of the construction site, podium, excavation, concrete pour, hotel elevator core, CUP (central utility plant) area, garage, hotel, concrete truck loads, and waterfront work); and Project Schedule (podium steel will be arriving soon, steel work will increase over the summer, and the schedule is moving along). He noted that the excavation is complete and 630,000 tons of dirt has been removed from the site. He reported that safety events were conducted during National Safety Week. He stated that they collect data to identify trends and when they noticed an increase in hand injuries - they started using a heavier glove. He stated they received three reportable injuries.

[11:14 a.m.](#) President De Salvio presented on Project Resources and Diversity. He stated that he has good news on the diversity front – their overall diversity goal for design contracts was 18.9% and they exceeded it with 20.9%; their overall diversity goal for construction contracts was 11.4% and they are currently at 12.1%; their construction workforce diversity goal for minorities was 15.3% and they are currently at 25.3%, they have met their female goal of 6.9%, and they are currently at 6.2% for their Veterans, exceeding their Veteran goal of 3%.

President DeSalvio also provided an overview of their community outreach and events which included a furniture, fixtures and equipment procurement event in January, a Girls in Trades event, and a Charlestown Community meeting. He stated that the outreach team has been active and he showed photographs of their events. He also reported that an event was held for current and former employees at Suffolk Downs and it was a great turnout. He stated that they are building their database and they hope to hire a number of them. He also reported that he met with a potential boat builder and he will meet with a potential operator for the water shuttles.

[11:26 a.m.](#) Jill Griffin, Director of Workforce, Supplier and Diversity Development, congratulated Wynn Boston Harbor on their diversity numbers and hard work. She stated that the purpose of the diversity programs is to cure past discrimination and eliminate barriers for economic opportunity. She stated that our licensees are required to set construction diversity goals. She reported that Wynn Boston Harbor and Suffolk Construction have introduced a diversity incentive program that is being described as innovative and a best practice in the industry.

[11:29 a.m.](#) Jacqui Krum, Senior Vice President and General Counsel for Wynn Resorts Development, provided an overview of the Diversity Recognition Program which is a collaborative effort with Suffolk Construction. She stated that the objective of the program is to recognize outstanding subcontractor achievements in meeting and exceeding workforce diversity goals. She provided an overview of the selection criteria and incentives which include: certificate of achievement, letter of recognition, dining gift cards, lunch, Wynn dice, and entry into a drawing for a Wynn Las Vegas package. She announced that the first diversity recognition award went to the J. Derenzo Company and best effort awards went to Bob Steel, Edward G. Sawyer, Liberty Construction, Lund Rebar Services, and TREVIICOS.

[11:36 a.m.](#) Ombudsman Ziemba introduced members of the Plainridge Park Casino (“PPC”) team who will present on their quarterly report.

Lance George, General Manager at PPC, presented on the first quarter operations which included employment. There are approximately 474 employees as of March 31<sup>st</sup> and their full-time/part-time mix remains stable at 66/34. He also reported that their diversity goal of 10% has grown to 22%.

Ruben Warren, Chief Financial Officer at PPC, presented on the first quarter financial performance which included revenue, taxes, spend by state, local spend, vendor diversity spend, lottery sales, and compliance with regulations.

Michele Collins, Vice President of Marketing at PPC, presented on local community events, charitable giving, sponsorships, marketing partnerships, and marketing giveaways.

[11:47 a.m.](#) Ombudsman Ziemba requested approval for an amendment to the Community Mitigation Fund Grant for the Hampden County Sheriff's Department to allow them to use one month's worth of lease assistance in FY18. The initial award was for FY17 but they had a one month delay in their lease.

[11:48 a.m.](#) *Commissioner Zuniga moved that the Commission approve the request from the Hampden County Sheriff's Department to use the monthly lease of \$35,000 for the next fiscal year '18. Motion seconded by Commissioner Macdonald. Roll Call Vote: Chairman Crosby – Aye, Commissioner Zuniga – Aye, Commissioner Macdonald – Aye, and Commissioner Stebbins – Aye. Motion passed unanimously.*

[11:49 a.m.](#) Chairman Crosby exited the meeting.

#### **Investigations and Enforcement Bureau (IEB)**

See transcript pages 109-114

[11:50 a.m.](#) Director Karen Wells presented on the suitability qualifier results for retired Admiral J. Lynn Johnson. She provided a summary of his professional and educational background. She stated that a background check was conducted and he was interviewed by the State Police and financial investigators with positive results. She noted that Mr. Johnson is new to the gaming industry. Director Wells stated that the IEB recommends that the Commission find Mr. Johnson suitable as a qualifier for Wynn Resorts.

[11:54 a.m.](#) *Commissioner Zuniga moved that the Commission approve the suitability of Admiral Johnson as applied by Director Wells. Motion seconded by Commissioner Macdonald. Roll Call Vote: Commissioner Zuniga – Aye, Commissioner Macdonald – Aye, and Commissioner Stebbins – Aye. Motion passed unanimously.*

#### **Legal Division**

See transcript pages 115-142

[11:55 a.m.](#) General Counsel Catherine Blue reported that all items listed under agenda item 8a are ready to start the promulgation process.

[11:56 a.m.](#) *Commissioner Macdonald moved that the Commission approve the small business impact statement for 205 CMR 136.08 (removing names from alcoholic beverage license) as included in the packet and authorize the staff to take all steps necessary*

*to begin the regulation promulgation process. Motion seconded by Commissioner Zuniga. Roll Call Vote: Commissioner Macdonald – Aye, Commissioner Zuniga – Aye, and Commissioner Stebbins – Aye. Motion passed 3 to 0.*

[11:57 a.m.](#) *Commissioner Macdonald moved that the Commission approve the small business impact statement for 205 CMR 143.02 (transfer of progressive jackpot) as included in the packet and authorize the staff to take all necessary steps to begin the regulation promulgation process. Motion seconded by Commissioner Zuniga. Roll Call Vote: Commissioner Macdonald – Aye, Commissioner Zuniga – Aye, and Commissioner Stebbins – Aye. Motion passed 3 to 0.*

[11:59 a.m.](#) *Commissioner Macdonald moved that the Commission approve the small business impact statements for 205 CMR 143.01, 205 CMR 138.56, and 205 CMR 139.04, as included in the packet and authorize the staff to take all steps necessary to begin the regulation promulgation process. Motion seconded by Commissioner Zuniga. Roll Call Vote: Commissioner Macdonald – Aye, Commissioner Zuniga – Aye, and Commissioner Stebbins – Aye. Motion passed 3 to 0.*

[12:00 p.m.](#) General Counsel Blue presented on the final draft and the amended small business impact statement for 205 CMR 147 – regulation on rules of the game. She reported that these regulations have gone through the promulgation process and a public hearing was held. Staff Attorney Carrie Torrisi noted that redlined edits were from comments received during the informal comment period.

[12:01 p.m.](#) *Commissioner Zuniga moved that the Commission approve the amended small business impact statement and final version of regulations 205 CMR 147, the Uniform Standards and Rules of the Games as included in the packet and authorize the staff to take all steps necessary to file the regulations with the Secretary of the Commonwealth and complete the formal regulation promulgation process. Motion seconded by Commissioner Macdonald. Roll Call Vote: Commissioner Macdonald – Aye, Commissioner Zuniga – Aye, and Commissioner Stebbins – Aye. Motion passed 3 to 0.*

[12:03 p.m.](#) General Counsel Catherine Blue presented on the amendments to the administrative closure regulation – 205 CMR 134.14.

*Commissioner Macdonald moved that the Commission approve the amendments to 205 CMR 134.14 as included in the packet and authorize staff to take the steps necessary to file the regulation with the Secretary of the Commonwealth and to proceed with a regulation promulgation process. Motion seconded by Commissioner Zuniga. Roll Call Vote: Commissioner Macdonald – Aye, Commissioner Zuniga – Aye, and Commissioner Stebbins – Aye. Motion passed 3 to 0.*

[12:04 p.m.](#) General Counsel Blue presented on updates to the surveillance regulation – 205 CMR 141. She stated that this is the initial review for the Commission and no vote is required. Staff Attorney Justin Stempeck stated that these amendments will be put out for informal public comment for two weeks.

[12:07 p.m.](#) Staff Attorney Justin Stempeck presented on amendments to 205 CMR 143.02 – which supplement the previously adopted GLI (Gaming Laboratory International)

standards pertaining to progressive slot machines and wide area progressive slot machines. Floyd Barroga, Gaming Technology Manager, provided a summary of a progressive gaming device. Attorney Stempeck stated that these amendments will be put out for informal public comment.

[12:12 p.m.](#) Deputy General Counsel Todd Grossman presented on amendments to 205 CMR 115.01. He stated that these amendments attempt to clarify reporting requirements from our licensee to the IEB. He stated that these amendments will be put out for informal public comment.

### **Commissioner's Update**

See transcript page 142

[12:22 p.m.](#) Commissioner Stebbins stated that the AOC (Access and Opportunity Committee) is represented by our licensees, general contractors, and stakeholders. He noted that they are doing great work.

### **Other Business Not Reasonably Anticipated**

See transcript page 143

[12:23 p.m.](#) *Having no further business, a motion to adjourn was made by Commissioner Zuniga. Motion seconded by Commissioner Macdonald. Roll Call Vote: Commissioner Macdonald – Aye, Commissioner Zuniga – Aye, and Commissioner Stebbins – Aye. Motion passed unanimously.*

### **List of Documents and Other Items Used**

1. Massachusetts Gaming Commission, Notice of Meeting and Agenda dated May 10, 2017
2. Massachusetts Gaming Commission, Draft Meeting Minutes dated April 27, 2017
3. SEIGMA Overview: Measuring the Social & Economic Impacts of Gambling in Massachusetts, Dr. Mark Melnik, Co-Principal Investigator, study dated May 10, 2017
4. Wynn Boston Harbor, Quarterly Report as of March 31, 2017
5. Plainridge Park Casino, Quarterly Report, Q1 2017
6. Massachusetts Gaming Commission, Memorandum dated May 5, 2017 regarding Hampden County Sheriff's Department Grant Amendment
7. Wynn Boston Harbor, Quarterly Diversity Recognition Program
8. 205 CMR 136.00: Sale and Distribution of Alcoholic Beverages, Small Business Impact Statement and draft amendments
9. 205 CMR 143.00: Gaming Devices and Electronic Gaming Equipment, Small Business Impact Statement and draft amendments
10. 205 CMR 143.00: Gaming Devices and Electronic Gaming Equipment, 205 CMR 138.00: Uniform Standards of Accounting Procedures and Internal Controls, and 205 CMR 139.00: Continuing Disclosure and Reporting Obligations of Gaming Licensees, Small Business Impact Statement and draft amendments
11. 205 CMR 147.00: Uniform Standards of Rules of the Games, Amended Small Business Impact Statement and final draft amendments
12. 205 CMR 141.00: Surveillance of the Gaming Establishment, draft amendments
13. 205 CMR 143.00: Gaming Devices and Electronic Gaming Equipment, draft amendments

14. 205 CMR 115.00: Phase 1 and New Qualifier Suitability Determination, Standards, and Procedures, draft amendments
15. 205 CMR 134.00: Licensing and Registration of Employees, Vendors, Junket Enterprises and Representatives, and Labor Organizations, draft amendments

/s/ Catherine Blue  
Catherine Blue, Assistant Secretary

DRAFT



**Massachusetts Gaming Commission  
Quarterly Report Presentation:  
1st Quarter 2017**

**May 25, 2017**





# Seth Stratton

*Vice President & General Counsel  
- MGM Springfield*



Brian Packer

*Vice President - Construction/Development*





# Construction Update





# AERIAL PROGRESS



Aerial View - December 14, 2016



Aerial View - March 13, 2017

Notes:

(1) Reference Quarter 1 2017 Status Report Section 5a and 5b.



# OVERALL SITE PROGRESS



Overall Site Activity from Armory - December 13, 2016

Notes:

(1) Reference Quarter 1 2017 Status Report Section 5a and 5b.



# OVERALL SITE PROGRESS



**Overall Site Activity from Armory - March 13, 2017**

Notes:

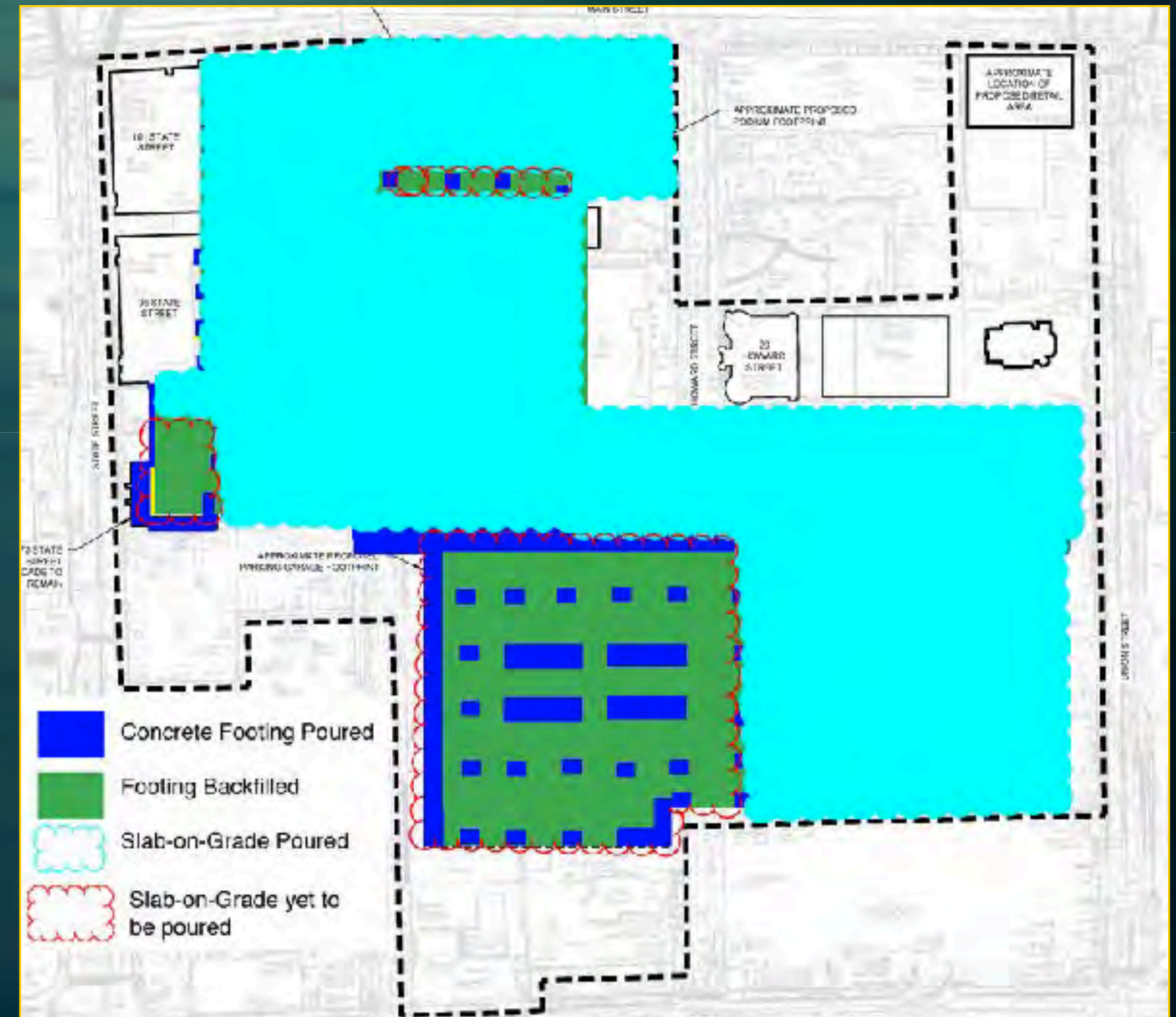
(1) Reference Quarter 1 2017 Status Report Section 5a and 5b.



# FOUNDATION PROGRESS



Foundation Diagram - December 20, 2016



Foundation Diagram - March 31, 2016

Notes:

(1) Reference Quarter 1 2017 Status Report Section 5a and 5b.



# PODIUM CONSTRUCTION PROGRESS



73 State Construction - January 26, 2017



Podium Construction - March 8, 2017



Podium Enclosure - March 8, 2017

## Notes:

- (1) Reference Quarter 1 2017 Status Report Section 5a and 5b.



# PODIUM CONSTRUCTION PROGRESS



Podium Enclosure - March 21, 2017

Notes:

(1) Reference Quarter 1 2017 Status Report Section 5a and 5b.



Clean Up - March 15, 2017



Podium Steel - March 28, 2017



# HOTEL CONSTRUCTION PROGRESS



**Main Street Scaffolding - January 19, 2017**

Notes:

(1) Reference Quarter 1 2017 Status Report Section 5a and 5b.



**Hotel Construction - February 8, 2017**



**Hotel Construction - February 7, 2017**



# HOTEL CONSTRUCTION PROGRESS



Hotel Entrance - January 25, 2017



Hotel Entrance - February 24, 2017



Hotel Entrance - March 8, 2017



Hotel Entrance - March 29, 2017

## Notes:

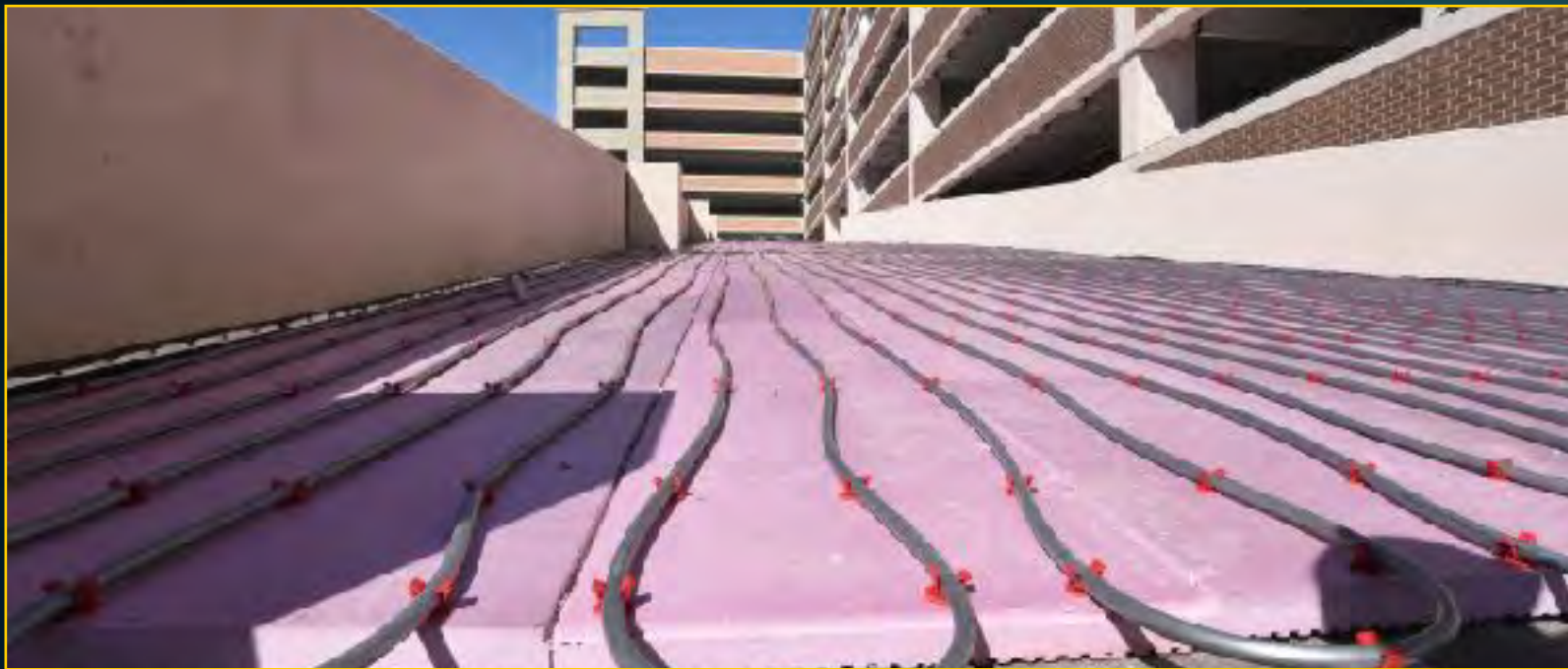
(1) Reference Quarter 1 2017 Status Report Section 5a and 5b.



# GARAGE CONSTRUCTION PROGRESS



Garage Construction - February 6, 2017



Garage Construction - March 3, 2017

## Notes:

(1) Reference Quarter 1 2017 Status Report Section 5a and 5b.



Garage Construction - March 8, 2017



# GARAGE CONSTRUCTION PROGRESS



Garage Construction - March 8, 2017

Notes:

(1) Reference Quarter 1 2017 Status Report Section 5a and 5b.



Garage Construction - March 28, 2017



# TOPPING OFF CEREMONY



**Topping Off Ceremony - March 29, 2017**

Notes:

(1) Reference Quarter 1 2017 Status Report Section 5a and 5b.



**Beam Signatures - March 29, 2017**



# TOPPING OFF CEREMONY



Topping Off Ceremony - March 29, 2017



Beam Signatures - March 29, 2017

## Notes:

- (1) Reference Quarter 1 2017 Status Report Section 5a and 5b.



Topping Off Ceremony - March 29, 2017



# DESIGN UPDATE

- 50% CD design review workshop held with City of Springfield Planning Department, their consultants, and Friedmutter Group
- Tour and review of the exterior facades and finishes mock-ups took place with City of Springfield and their consultants
- Design work on the Childcare Center began
- Garage construction documents Addenda 6-8 submitted to Building Department
- 95 State Street Permit Set Delta 1 issued
- 100% submission for the Intelligent Transportation System (ITS) enhancements and roadway lighting mitigation, package 2 of 2, made to MassDOT



## Notes:

- (1) Reference Quarter 1 2017 Status Report Section 5a.

# SCHEDULE

- Final project schedule was submitted to MGC on November 6, 2015.
- Monthly updates were provided on:
  - January 29, 2017
  - February 26, 2017
  - April 5, 2017

Notes:

(1) Reference Quarter 1 2017 Status Report Section 1a and Appendix A.



# Seth Stratton

*Vice President & General Counsel  
- MGM Springfield*



# Q1 2017 COST ESTIMATE (\$mm)

Ref	Description	Incurred To Date	Remaining	Total Estimate
1	Construction / Design	\$183.6	\$313.2	\$496.8
2	FF&E	\$0.1	\$74.9	\$75.0
3	OSE	\$0	\$43.7	\$43.7
	<b>Subtotal of Eligible Cap. Costs</b>	<b>\$183.7</b>	<b>\$431.8</b>	<b>\$615.5</b>
4	Land	\$49.5	\$1.8	\$51.3
5	Off-site Parcel Improvements	\$11.3	\$0	\$11.3
6	License/ Application Fees	\$85.0	\$0	\$85.0
7	Pre-opening Exp. / Host Comm. Costs	\$47.7	\$74.8	\$122.5
8	Fin. Costs / Capitalized Int.	\$18.0	\$50.5	\$68.5
9	Project Contingency	\$0	\$35.0 - \$41.8	\$35.0 - \$41.8
	<b>Subtotal of Ineligible Costs</b>	<b>\$211.5</b>	<b>\$162.1 – \$168.9</b>	<b>\$373.6 - \$380.4</b>
	<b>Total</b>	<b>\$395.2</b>	<b>\$593.9 - \$600.7</b>	<b>\$989.1 - \$995.9</b>

Notes:

(1) Total estimate before Contingency is \$954.1mm. If spent, Contingency is more likely to be spent on and reclassified as Eligible Capital Costs.

(2) The figures above are approximations to the nearest hundred thousand, which in some instances results in minor discrepancies (\$100k or less) in sums.



Brian Packer

*Vice President - Construction/Development*



# Diversity Update





# DESIGN & CONSTRUCTION COMMITMENTS

## THROUGH MARCH 31, 2017

Group	Project Goals	Commitments	Variance	Company Count	Value
WBE	10.0%	16.6%	6.6%	58	\$55.63M
MBE	5.0%	7.7%	2.7%	32	\$25.87M
VBE	2.0%	5.3%	3.3%	19	\$17.79M

**Notes:**

- (1) Total Commitments through March 31, 2017 are \$335.3M.
  - (2) Includes companies that are certified with the following agencies:
    - MBE - Massachusetts Supplier Diversity Office or Greater New England Minority Supplier Development Council.
    - WBE - Massachusetts Supplier Diversity Office or Women's Business Enterprise National Council.
    - VBE - United States Department of Veteran Affairs or Massachusetts Gaming Commission.
  - (3) Reference Quarter 1 2017 Status Report Section 2b and Appendix B.
- WBE = Woman-owned Business Enterprise; MBE = Minority-owned Business Enterprise; VBE = Veteran-owned Business Enterprise.

# DESIGN & CONSULTING COMMITMENTS

## THROUGH MARCH 31, 2017

Group	Project Goals	Commitments	Company Count	Value
WBE	10.0%	15.3%	14	\$6.04M
MBE	5.0%	12.7%	14	\$5.03M
VBE	2.0%	7.1%	3	\$2.79M

**Notes:**

- (1) Total Commitments through March 31, 2017 are \$39.5M.
  - (2) Includes companies that are certified with the following agencies:
    - MBE - Massachusetts Supplier Diversity Office or Greater New England Minority Supplier Development Council.
    - WBE - Massachusetts Supplier Diversity Office or Women's Business Enterprise National Council.
    - VBE - United States Department of Veteran Affairs or Massachusetts Gaming Commission.
  - (3) Reference Quarter 1 2017 Status Report Section 2b and Appendix B.
- WBE = Woman-owned Business Enterprise; MBE = Minority-owned Business Enterprise; VBE = Veteran-owned Business Enterprise.

# DESIGN & CONSULTING COMMITMENTS

## AS OF MARCH 31, 2017

Ref	Company	Scope	Location	Diversity Status
1	AAC Investments, LLC	Interior Design	Los Angeles, CA	WBE
2	AFO Project Consulting, LLC	Construction Consulting	Las Vegas, NV	VBE
3	Akal Engineering, Inc.	MEP Consulting Engineering Services	Boylston, MA	MBE
4	Andelman & Lelek Engineering, Inc.	Energy Modeling	Norwood, MA	WBE
5	Blackford, LLC	Construction Management	Las Vegas, NV	VBE
6	Black Hawk Group	Consulting Engineer Services	Philadelphia, PA	MBE
7	C&C Consulting Engineers, LLC	Structural Peer Review	Allston, MA	MBE
8	Calvin Consulting Services, LLC	Construction Consulting	Las Vegas, NV	WBE
9	Communications for Design LLC	Design and Project Management Support Services	Northfield, MN	WBE
10	Convergent Technologies	Acoustics/ Audio Visual/ IT/ Low Voltage	Lockport, NY	WBE
11	Copley Wolff Design Group, Inc.	Full Landscape Architectural Services	Boston, MA	WBE
12	Desert Construction Consulting, Ltd	Estimating and Contractor Bidding Services	Henderson, NV	MBE
13	Desman, Inc.	Parking Garage Bridging Documents (LOA)	Boston, MA	MBE
14	Dietz & Company Architects, Inc.	Full Service Architecture and Interior Design	Springfield, MA	WBE
15	Engineers Design Group, Inc.	Structural Engineering Consulting Services	Malden, MA	MBE
16	Erin Chrusciel Photography, LLC	Photography	East Longmeadow, MA	WBE

**Notes:**

- (1) Includes companies that are certified with the following agencies:
    - MBE - Massachusetts Supplier Diversity Office or Greater New England Minority Supplier Development Council.
    - WBE - Massachusetts Supplier Diversity Office or Women's Business Enterprise National Council.
    - VBE - United States Department of Veteran Affairs or Massachusetts Gaming Commission.
  - (2) Green highlighted companies have been paid as of February 28, 2017.
  - (3) Reference Quarter 1 2017 Status Report Section 2b and Appendix B.
- WBE = Woman-owned Business Enterprise; MBE = Minority-owned Business Enterprise; VBE = Veteran-owned Business Enterprise.



# DESIGN & CONSULTING COMMITMENTS

## AS OF MARCH 31, 2017

Ref	Company	Scope	Location	Diversity Status
17	Fernandez & Associates	Fire Protection Design and Code Consulting Services	Byfield, MA	MBE
18	JoAnn Jones	Administrative Services	Henderson, NV	WBE
19	Marshall Moya Design, LLC	Architectural Services	Washington, DC	MBE
20	MCLA, Inc.	Lighting	Washington, DC	WBE
21	Nitsch Engineering, Inc.	Engineering Services	Boston, MA	WBE
22	Pristine Engineers, Inc.	MEP Peer Review Services	Raynham, MA	MBE
23	Renderready, LLC	Rendering and Graphic Design	Albuquerque, NM	MBE
24	Soden Sustainability Consulting, LLC	LEED	Winchester, MA	WBE
25	Spec's Design Group, LLC	Interior Design	Springfield, MA	WBE
26	Stevens & Associates	Façade Stabilization Design	Brattleboro, VT	VBE
27	Timothy Haahs & Associates, Inc.	Architect and Engineer of Record/ Parking Consultant	Blue Bell, PA	MBE
28	US Inspection & Consulting, LLC	Construction Inspections	Lake Havasu City, AZ	MBE
29	VAV International, Inc.	Mechanical Consulting	Woburn, MA	MBE
30	WA Architects, Inc.	Architectural Services	Cleveland, OH	MBE
31	YA Construction Services, LLC	MEP Peer Review	St. Louis, MO	WBE

**Notes:**

- (1) Includes companies that are certified with the following agencies:
    - MBE - Massachusetts Supplier Diversity Office or Greater New England Minority Supplier Development Council.
    - WBE - Massachusetts Supplier Diversity Office or Women's Business Enterprise National Council.
    - VBE - United States Department of Veteran Affairs or Massachusetts Gaming Commission.
  - (2) Green highlighted companies have been paid as of February 28, 2017.
  - (3) Reference Quarter 1 2017 Status Report Section 2b and Appendix B.
- WBE = Woman-owned Business Enterprise; MBE = Minority-owned Business Enterprise; VBE = Veteran-owned Business Enterprise.

# CONSTRUCTION COMMITMENTS

## AS OF MARCH 31, 2017

Group	Project Goals	Commitments	Company Count	Value
WBE	10.0%	16.8%	44	\$49.59M
MBE	5.0%	7.0%	18	\$20.83M
VBE	2.0%	5.1%	16	\$15.00M

**Notes:**

- (1) Total Commitments through March 31, 2017 are \$295.8M.
  - (2) Includes companies that are certified with the following agencies:
    - MBE - Massachusetts Supplier Diversity Office or Greater New England Minority Supplier Development Council.
    - WBE - Massachusetts Supplier Diversity Office or Women's Business Enterprise National Council.
    - VBE - United States Department of Veteran Affairs or Massachusetts Gaming Commission.
  - (3) Reference Quarter 1 2017 Status Report Section 2b and Appendix B.
- WBE = Woman-owned Business Enterprise; MBE = Minority-owned Business Enterprise; VBE = Veteran-owned Business Enterprise.

# DIVERSE CONSTRUCTION COMPANIES

AS OF MARCH 31, 2017

Ref	Company	Scope	Location	Diversity Status
1	Aces Enterprises, LLC	Steel Plate Supplier	Dunlap, IL	VBE
2	AeroSage, LLC	Materials Fabricator	Tampa, FL	VBE
3	Alares, LLC	Commissioning and Construction Services	Quincy, MA	VBE
4	All American Signs	Signage	Plymouth, MA	VBE
5	Alonzee Consulting	Construction Consulting	Las Vegas, NV	WBE
6	American Environmental, Inc.	Abatement	Holyoke, MA	MBE
7	American Stair Corporation	Stair Supplier	Romeoville, IL	VBE
8	Architectural Products, Inc.	Glass and Glazing	Burlington, CT	WBE
9	Argent Associates, Inc.	Material Vendor	Burlington, CT	WBE
10	Arrow Security Corporation	Security Guard Services	Springfield, MA	VBE
11	Ayala Excavating and Trucking, LLC	Trucking	Springfield, MA	MBE
12	Baron Industries, Inc	Coiling Doors	Woburn, MA	VBE
13	BECO Electrical Contractors, Inc.	Electrical	Monson, MA	VBE
14	Berkshire Concrete Cutting, LLC	Saw Cutting	Torrington, CT	WBE
15	Brican, Inc.	General Contracting Services	Springfield, MA	VBE

**Notes:**

(1) Green highlighted companies have worked on site and been paid as of February 28, 2017.

(2) Reference Quarter 1 2017 Status Report Section 2b and Appendix B.

WBE = Woman-owned Business Enterprise; MBE = Minority-owned Business Enterprise; VBE = Veteran-owned Business Enterprise.



# DIVERSE CONSTRUCTION COMPANIES

AS OF MARCH 31, 2017

Ref	Company	Scope	Location	Diversity Status
16	C4 Cables	Datacom, Cabling, Fiber Supplier	Taunton, MA	WBE
17	C&C Contractors, LLC	Trucking Services	Springfield, MA	MBE
18	C&D Electronics, Inc.	Cabling, Wiring, Electronics Supplier	Holyoke, MA	WBE/MBE
19	Capasso Restoration, Inc.	Masonry Contractor	North Haven, CT	WBE
20	Chabot & Burnett Construction Co., Inc.	Masonry Contractor	Agawam, MA	WBE
21	CK Flooring Solutions, Inc.	Carpet Installer	Chicopee, MA	WBE
22	CMJ, LLC	Property Management/Maintenance	Springfield, MA	MBE
23	Connecticut Drywall Finishing, Inc.	Drywall	West Springfield, MA	WBE
24	Connecticut Temperature Controls, LLC	Controls	Newington, CT	VBE
25	Coghlin Electrical Contractors, Inc.	Electrical Services	Worcester, MA	WBE
26	C.R. Levesque Trucking Corp.	Hauling & Equipment Transportation	Monson, MA	WBE
27	Dagle Electrical Construction Corp.	Electrical	Melrose, MA	WBE
28	Davenport Advisors, LLC	Property Management/ Maintenance	Boston, MA	MBE
29	Dependable Masonry Construction Company, Inc.	Masonry and Brickpaving	North Reading, MA	MBE
30	Eastern General Contractors, Inc.	General Contractor - Rigging	Springfield, MA	MBE

**Notes:**

(1) Green highlighted companies have worked on site and been paid as of February 28, 2017.

(2) Reference Quarter 1 2017 Status Report Section 2b and Appendix B.

WBE = Woman-owned Business Enterprise; MBE = Minority-owned Business Enterprise; VBE = Veteran-owned Business Enterprise.

# DIVERSE CONSTRUCTION COMPANIES

## AS OF MARCH 31, 2017

Ref	Company	Scope	Location	Diversity Status
31	EDM Construction, Inc.	Carpentry & Structural Steel Erection	Merrimac, MA	WBE
32	E L Waterman, Inc.	Pipe Supplier	Foxboro, MA	WBE
33	Evermore Light & Power, Inc.	Electrical	Somerville, MA	WBE
34	Fabiano Oil Corp.	Fuel & Oil Supplier	Wrentham, MA	WBE
35	Federal Concrete, Inc.	Concrete Services	Hopedale, MA	WBE
36	Fisher Contracting Corporation	General Contracting Services	Worcester, MA	WBE
37	Fletcher Sewer & Drain, Inc.	Inspection - FEIR	Ludlow, MA	WBE
38	Folan Waterproofing and Construction Company, Inc.	Masonry Contractors & Waterproofing	South Easton, MA	WBE
39	Frisoli Electric, Inc.	Electrical	Holbrook, MA	VBE
40	Gomes Construction Co. Inc.	Utility Connections	Ludlow, MA	WBE
41	Granite City Electric Supply Company, Inc.	Electrical Supplier	Quincy, MA	WBE
42	Green Insulation, Inc.	Insulation	Adams, MA	WBE
43	H B Welding, Inc.	Steel, Welding, Iron Work	Johnston, RI	WBE
44	Homeland Mechanical, LLC	Pipe Supplier	Quincy, MA	VBE
45	Industrial Flame Cutting, Inc.	Steel Plate Supplier	Beacon Falls, CT	VBE

**Notes:**

(1) Green highlighted companies have worked on site and been paid as of February 28, 2017.

(2) Reference Quarter 1 2017 Status Report Section 2b and Appendix B.

WBE = Woman-owned Business Enterprise; MBE = Minority-owned Business Enterprise; VBE = Veteran-owned Business Enterprise.



# DIVERSE CONSTRUCTION COMPANIES

## AS OF MARCH 31, 2017

Ref	Company	Scope	Location	Diversity Status
46	JMK Building Supply, Inc	Drywall	Colchester, CT	WBE
47	JRL Construction, Inc.	General Contractor - Demolition	Springfield, MA	VBE
48	Kittredge Equipment Company, Inc.	Kitchen Equipment	Agawam, MA	WBE
49	L.K. Sheet Metal, Inc.	Sheet Metal	East Hartford, CT	WBE
50	Larry's Trucking Co.	Trucking	Springfield, MA	MBE
51	Lindon Group	Piping Materials	East Providence, RI	WBE
52	Markings Inc.	Pavement Marking Services	Pembroke, MA	WBE
53	Medeiros Hydroseeding & Landscaping Construction, Inc.	Trucking and Soil Materials	Monson, MA	MBE
54	Moor Metals, Inc.	Sales and Distribution of Metals	Holliston, MA	MBE
55	Ms. Pipe, LLC	Procurement of Valves, Pipes and Fittings	South Windsor, CT	WBE
56	New England Foundation Company, Inc.	Helical Piles	Boston, MA	WBE
57	Northeastern Steel Corporation	Steel Distributor	Revere, MA	MBE
58	Performance Testing & Balancing LLC	Testing & Balancing	South Hampton, MA	VBE
59	Piping Systems, Inc.	HVAC	Assonet, MA	WBE
60	Protocol Management Services, Inc.	Access Flooring	North Attleboro, MA	WBE
61	R K Insulation Contractors, Inc.	Insulation Services	Hartford, CT	MBE

**Notes:**

(1) Green highlighted companies have worked on site and been paid as of February 28, 2017.

(2) Reference Quarter 1 2017 Status Report Section 2b and Appendix B.

WBE = Woman-owned Business Enterprise; MBE = Minority-owned Business Enterprise; VBE = Veteran-owned Business Enterprise.

# DIVERSE CONSTRUCTION COMPANIES

AS OF MARCH 31, 2017

Ref	Company	Scope	Location	Diversity Status
62	Rebars & Mesh, Inc.	Concrete	Haverhill, MA	WBE
63	Regis Steel Corporation	Steel Erection/ Reinforcing	Fall River, MA	MBE
64	S&F Concrete Contractors, Inc.	Concrete	Hudson, MA	MBE
65	Security Construction Services, Inc.	Fencing	Hudson, MA	WBE
66	SOS Corporation	Construction Cleaning, Selective Interior Demolition	Milford, MA	WBE
67	Steere Engineering, Inc.	Engineering Services	Warwick, RI	WBE
68	Strategic Environmental Services, Inc.	Environmental Consultants	Sutton, MA	WBE
69	Supplies Exchange Systems	Materials Supplier	Dorchester, MA	MBE
70	Tavares, LLC	Fireproofing	Providence, RI	MBE
71	T & M Equipment Corporation	Excavating Contractor	Springfield, MA	VBE
72	Titan Roofing Company	Roofing	Springfield, MA	MBE
73	Triton Leasing and Rental, Inc.	Demolition & Abatement	Feeding Hills, MA	WBE
74	Turtle & Hughes, Inc.	Electrical Supplier	Linden, NJ	WBE
75	Ultimate Abatement Company, Inc.	Abatement	Plainfield, MA	WBE
76	Welch Associates Land Surveyors, Inc.	Land Surveying	West Bridgewater, MA	WBE
77	Willow Tree Outdoor, LLC	Landscape	Springfield, MA	WBE
78	Younger Brothers Construction, LLC	Materials Supplier	Watertown, MA	MBE

**Notes:**

(1) Green highlighted companies have worked on site and been paid as of February 28, 2017.

(2) Reference Quarter 1 2017 Status Report Section 2b and Appendix B.

WBE = Woman-owned Business Enterprise; MBE = Minority-owned Business Enterprise; VBE = Veteran-owned Business Enterprise.



# WORKFORCE DIVERSITY STATISTICS - TOTAL

## AS OF MARCH 30, 2017

Group	Project Goals	Project To Date %
Women	6.90%	10.27%
Minority	15.30%	24.07%
Veteran	8.00%	10.37%

**Notes:**

- (1) Statistics include all workforce reports that were received by MGM as of March 30, 2017.
- (2) The Diversity plan approved by the MGC allows reporting to include hours allocated to multiple diversity categories. 6.52% of total workforce hours are included in two of the diversity categories and 0.30% of total workforce hours are included in three diversity categories.
- (3) Reference Quarter 1 2017 Status Report Section 2c and Appendix B and C.
- (4) While this is not a reporting requirement of the approved diversity plan, the total hours worked through 1st Quarter 2017 is as follows:
  - Approximately 38% are from Springfield/ Surrounding Communities
  - Approximately 59% are from Western Massachusetts
  - Approximately 82% are from Massachusetts



# CURRENT QUARTER SITE PROGRESS



Hotel Construction - May 11, 2017



Hotel Construction - May 12, 2017



# CURRENT QUARTER SITE PROGRESS



Podium Construction - May 12, 2017



Podium Construction - May 19, 2017



Hotel Construction - May 12, 2017



# CURRENT QUARTER SITE PROGRESS



Garage Topping Off - May 17, 2017



Garage Worker Barbecue - May 11, 2017



Garage Topping Off - May 17, 2017



# Seth Stratton

*Vice President & General Counsel  
- MGM Springfield*







# MGM SPRINGFIELD

## QUARTERLY STATUS REPORT #9

Monitoring of Project Construction and  
Licensee Requirements  
205 CMR 135

For the Period:  
January–March 2017





**QUARTERLY STATUS REPORT: JANUARY-MARCH 2017**

---

**TABLE OF CONTENTS**

TABLE OF CONTENTS ..... 1

LIST OF APPENDICES ..... 1

1 PROJECT SCHEDULE..... 2

    1a CURRENT SCHEDULE ..... 2

    1b PROJECT SCHEDULE CHANGES ..... 2

2 CONSTRUCTION PHASE DIVERSITY PROGRAM FOR EQUAL OPPORTUNITY ..... 3

    2a DIVERSITY SUMMARY ..... 3

    2b COMMITMENTS ..... 4

    2c WORKFORCE STATISTICS ..... 5

3 COST OF CONSTRUCTION / CAPITALIZATION OF GAMING LICENSEE ..... 6

4 DESIGN & CONSTRUCTION CONTRACTS..... 7

5 STATUS OF WORK COMPLETED / PROGRESS PHOTOGRAPHS..... 9

    5a STATUS OF WORK COMPLETED ..... 9

    5b PROGRESS PHOTOGRAPHS ..... 11

6 PERMITS ..... 14

7 ORGANIZED LABOR LETTER ..... 18

8 OPERATIONAL PHASE DIVERSITY PROGRAM FOR EQUAL OPPORTUNITY ..... 19

**LIST OF APPENDICES**

LEVEL 1 AND LEVEL 2 PROJECT SCHEDULES – DATA DATE APRIL 2, 2017.....APPENDIX A

PRESENTATION TO THE ACCESS AND OPPORTUNITY COMMITTEE OF APRIL 11, 2017.....APPENDIX B

CONSTRUCTION WORKFORCE STATISTICS AS OF MARCH 30, 2017.....APPENDIX C

LETTER REGARDING COST OF CONSTRUCTION & CAPITALIZATION OF GAMING LICENSEE.... APPENDIX D

CONSTRUCTION SITE PROGRESS IMAGES AS OF MARCH 31, 2017.....APPENDIX E





# QUARTERLY STATUS REPORT: JANUARY-MARCH 2017

---

*135.02.2 The commission shall, in accordance with M.G.L. c. 23K, §§ 10 and 11 approve for each gaming licensee, a project schedule for the gaming licensee's capital investment in its gaming establishment and related infrastructure which includes:*

*(a) all major stages of design and construction; including all permitting and approvals, design deliverables, site preparation, foundation, structure, plumbing, electrical, mechanical, exterior finish and fenestration, long lead items, insulation, interior finish and furnishings and landscaping, building commissioning and commissioning of gaming equipment and information technology systems.*

*(b) For a Category 1 gaming establishment, a timeline for commencement of the final stage of construction pursuant to M.G.L. c. 23K, § 10(a); and*

*(c) a timeline for the stage of construction at which the gaming licensee shall be approved to open for business or operate a slot machine pursuant to M.G.L. c. 23K, §§10(c) and 11(a).*

*135.02.4 If unforeseen and/or changed circumstances necessitate a change to a project schedule approved pursuant to 205 CMR 135.02(2) which will impact the completion date or requires a major change in the method or progress of construction, the gaming licensee may submit to the commission for its approval a revised project schedule, with a detailed statement of the unforeseen changed circumstances which justify the revised project schedule. If the commission approves such revised project schedule, it shall substitute and supersede the previously approved project schedule.*

---

## 1 PROJECT SCHEDULE

### 1a CURRENT SCHEDULE

On August 6, 2015, the Massachusetts Gaming Commission approved a revised opening date of thirty (30) days following a construction completion date of either August 6, 2018 or the date on which the I-91 Viaduct Project achieves Full and Beneficial Use (as defined in MassDOT project documents), whichever occurs later. MGM submitted a final project schedule for consideration on November 6, 2015. In accordance with our commitment to providing monthly schedule updates, schedule updates were provided to MGC's representative on January 1st, January 29th, February 26th, and April 5th of 2017 (data date 4/2/17). The April 5th update is included in this document as Appendix A.

### 1b PROJECT SCHEDULE CHANGES

There are no changes to report that would alter MGM's opening date.



**QUARTERLY STATUS REPORT: JANUARY-MARCH 2017**

*135.02.3 Within the time frame provided in the award of the gaming license, the licensee shall provide to the commission for commission approval an affirmative action program of equal opportunity whereby the licensee establishes specific goals for the utilization of minorities, women and veterans on construction jobs and for contracting with minority, women or veteran owned businesses during either design or construction; provided, however that such goals shall be equal to or greater than the goals contained in Executive Office of Administration and Finance Administrative Bulletin Number 14.*

*135.02.5c To ensure adherence to the project schedule approved pursuant to 205 CMR 135.02(2) or (4), the gaming licensee shall submit to the commission in a media, format and level of detail acceptable to the commission, quarterly a status report including:*

*(e) a detailed statistical report pursuant to M.G.L. c. 23K, §21(a)(23) on the number, gender and race, and veteran status of individuals by job classifications hired to perform labor as part of the construction of the gaming establishment and related infrastructure, and a comparison of this report with the goals established by the gaming licensee and commission pursuant to M.G.L. c. 23K, §21(a)(22). ). In the event the licensee’s hiring of the aforementioned entities does not comply with the goals established the licensee shall submit within 20 days of a request by the commission a response as to why the goals have not been achieved, identify any good faith efforts that have been undertaken to achieve those goals and provide a plan to bring the dollar amount contracted and spent into compliance with the goals.*

*(f) a report describing the number of contracts, total dollar amounts contracted with and actually paid to minority business enterprises, women business enterprises and veteran business enterprises for design and construction of the gaming establishment and related infrastructure, and the total number and value of all subcontracts awarded to a minority, women and veteran owned business, and a comparison of these reports with the goals established by the gaming licensee and commission pursuant to M.G.L. c. 23K, §21(a)(21). In the event the licensee’s hiring of the aforementioned entities does not comply with the goals established the licensee shall submit within 20 days of a request by the commission a response as to why the goals have not been achieved, identify any good faith efforts that have been undertaken to achieve those goals and provide a plan to bring the dollar amount contracted and spent into compliance with the goals.*

**2 CONSTRUCTION PHASE DIVERSITY PROGRAM FOR EQUAL OPPORTUNITY**

**2a DIVERSITY SUMMARY**

The following is a snapshot of Construction and Design Diversity Commitments through March 31:

GROUP	PROJECT GOALS	COMMITMENTS	VARIANCE	COMPANY COUNT	VALUE
WBE	10.00%	16.6%	6.6%	58	\$55.63M
MBE	5.00%	7.7%	2.7%	32	\$25.87M
VBE	2.00%	5.3%	3.3%	19	\$17.79M

Notes:

1. Total Commitments through March 31, 2017 are \$335.3M
2. Includes companies that are certified with the following agencies:
  - MBE - Massachusetts Supplier Diversity Office or Greater New England Minority Supplier Development Council.
  - WBE - Massachusetts Supplier Diversity Office or Women’s Business Enterprise National Council.
  - VBE - United States Department of Veteran Affairs or Massachusetts Gaming Commission.





# QUARTERLY STATUS REPORT: JANUARY-MARCH 2017

Updates on outreach activities and additional diversity reporting are presented monthly to the Access and Opportunity Committee of the Massachusetts Gaming Commission. The most recent AOC presentation for April 11, 2017 is included as [Appendix B](#).

## 2b COMMITMENTS

### Design and Consulting Commitments

The following is a snapshot of Design and Consulting Diversity Commitments through March 31:

GROUP	PROJECT GOALS	COMMITMENTS	CONSULTANT COUNT	VALUE
Women	10.00%	15.3%	14	\$6.04M
Minority	5.00%	12.7%	14	\$5.03M
Veteran	2.00%	7.1%	3	\$2.79M

Notes:

- Total Commitments through March 31, 2017 are \$39.5M
- Includes companies that are certified with the following agencies:
  - MBE - Massachusetts Supplier Diversity Office or Greater New England Minority Supplier Development Council.
  - WBE - Massachusetts Supplier Diversity Office or Women's Business Enterprise National Council.
  - VBE - United States Department of Veteran Affairs or Massachusetts Gaming Commission.

A listing of design and consulting companies included in the totals above is included in [Appendix B](#).

### Construction Commitments

The following is a snapshot of Construction Diversity Commitments through March 31:

GROUP	PROJECT GOALS	COMMITMENTS	CONSULTANT COUNT	VALUE
Women	10.0%	16.8%	44	\$49.59M
Minority	5.0%	7.0%	18	\$20.83M
Veteran <sup>(3)</sup>	2.0%	5.1%	16	\$15.00M

Notes:

- Total Commitments through March 31, 2016 are \$295.8M
- Includes companies that are certified with the following agencies:
  - MBE - Massachusetts Supplier Diversity Office or Greater New England Minority Supplier Development Council.
  - WBE - Massachusetts Supplier Diversity Office or Women's Business Enterprise National Council.
  - VBE - United States Department of Veteran Affairs or Massachusetts Gaming Commission.

A listing of construction companies included in the totals above is included in [Appendix B](#).





## QUARTERLY STATUS REPORT: JANUARY-MARCH 2017

---

### 2c WORKFORCE STATISTICS

Subcontractors have been submitting workforce tracking forms after each pay period. The most recent available results have been tallied and are included as [Appendix C](#).

Summary workforce statistics for the total Project as of March 30 are as follows:

GROUP	PROJECT GOALS	PROJECT TO DATE %
Women	6.90%	10.27%
Minority	15.30%	24.07%
Veteran	8.00%	10.37%

Notes:

1. Statistics include all workforce reports that were received by MGM as of March 30, 2017.

Additional workforce statistics and reporting is included in [Appendix B](#).



## QUARTERLY STATUS REPORT: JANUARY-MARCH 2017

---

135.02.5a To ensure adherence to the project schedule approved pursuant to 205 CMR 135.02(2) or (4), the gaming licensee shall submit to the commission in a media, format and level of detail acceptable to the commission, quarterly a status report including:

(a) the total estimated cost of construction of the project and related infrastructure improvements, including a sworn certification regarding costs incurred pursuant to 205 CMR 122.03: Costs Included in the Calculation of Capital Investment, and separately identifying detailed costs for design, land acquisition, site preparation and construction and off-site improvements

(b) a sworn certification regarding the capitalization of the gaming licensee, sufficient for the commission to determine, pursuant to M.G.L. c. 23K §10(e) or 11(c), that the gaming licensee has adequate funds to complete the gaming establishment and related infrastructure improvements.

---

### 3 COST OF CONSTRUCTION / CAPITALIZATION OF GAMING LICENSEE

Pursuant to 205 CMR 135.02.5(a) and (b), please see [Appendix D](#) for a certification regarding (a) the total estimated cost of construction of the project and related infrastructure improvements, and (b) the capitalization of MGM Springfield.





## QUARTERLY STATUS REPORT: JANUARY-MARCH 2017

135.02.5c To ensure adherence to the project schedule approved pursuant to 205 CMR 135.02(2) or (4), the gaming licensee shall submit to the commission in a media, format and level of detail acceptable to the commission, quarterly a status report including:

(c) a copy of all design and construction contracts executed within the prior quarter by the gaming licensee to design and construct the gaming establishment and related infrastructure improvements

### 4 DESIGN & CONSTRUCTION CONTRACTS

The following contracts were executed in the first quarter of 2017:

COMPANY	CONTRACT	MGC STATUS
1. Northern Construction	Letter of Agreement for Offsite Improvements General Contractor	Registrant
2. Kleeberg Sheet Metal, Inc.	Tishman Letter of Agreement for Sheet Metal Systems for the Podium Core and Shell	Subcontractor to Tishman
3. Massey's Plate Glass	Tishman Letter of Agreement for Aluminum Curtain Wall, Windows, Doors, Entrances, Storefronts and Glazing	Subcontractor to Tishman
4. Baron Industries	Tishman Letter of Agreement for Fire Rated Coiling Doors	Subcontractor to Tishman
5. KHS&S	Tishman Letter of Agreement for Exterior Façade	Subcontractor to Tishman
6. Schneider Electric	Tishman Letter of Agreement for ATC/BMS Systems	Subcontractor to Tishman
7. Unistrut Construction	Tishman Letter of Agreement for Strut Support System	Subcontractor to Tishman
8. John W. Egan Co., Inc.	Tishman Letter of Agreement for Paint and Central Electric Facility	Subcontractor to Tishman
9. Willco Sales	Tishman Letter of Agreement for Operable Partitions	Subcontractor to Tishman
10. Jensen Hughes	Smoke Control Testing Services	Pending
11. Blackford	Design Support Services	Registrant
12. Maryann Thompson Architects	Letter of Agreement for Architectural Services for Childcare Facility	Pending
13. TempAir	Tishman Letter of Agreement for Temporary Heat Equipment	Subcontractor to Tishman



## QUARTERLY STATUS REPORT: JANUARY-MARCH 2017

---

14. Fontaine Brothers	Letter of Agreement for 95 State Street General Contractor	Registrant
15. CK Flooring Solutions	Tishman Letter of Agreement for Hotel Podium Self-Leveling Flooring	Subcontractor to Tishman
16. Wolverine Fire Protection	Tishman Letter of Agreement for Fire Protection Systems at Hotel Podium, Entertainment and CUP Areas	Subcontractor to Tishman
17. ML Schmitt	Tishman Letter of Agreement for Construction Power Distribution at Hotel Podium	Subcontractor to Tishman
18. Edwards System Technology (EST)	Tishman Letter of Agreement for Fire Alarm	Subcontractor to Tishman

Copies of executed agreements are available to the Massachusetts Gaming Commission's Representative for review.

# QUARTERLY STATUS REPORT: JANUARY-MARCH 2017

---

135.02.5d To ensure adherence to the project schedule approved pursuant to 205 CMR 135.02(2) or (4), the gaming licensee shall submit to the commission in a media, format and level of detail acceptable to the commission, quarterly a status report including:

(d) a status report reflecting the progress of construction and certifying compliance with the approved project schedule for major stages of construction. In the event that the progress of construction does not comply with the project schedule approved pursuant to 205 CMR 135.02, the licensee shall submit a detailed plan to bring the progress of construction into compliance with the approved project schedule or submit a request for a revised project schedule pursuant to 205 CMR 135.02(4)

---

## 5 STATUS OF WORK COMPLETED / PROGRESS PHOTOGRAPHS

### 5a STATUS OF WORK COMPLETED

The following onsite activities took place in the first quarter of 2017:

- Parking Garage: Precast concrete erection and slab pours are underway. Installation of lighting is proceeding on all levels. Storm drainage piping is proceeding on all levels. Wiring for Fire Alarm and CCTV Security is proceeding on several levels. Fire protection is being installed on several levels. Glycol tubes for the snow melt system are being installed on exterior ramp. Glass/glazing installation at stair towers has begun.
- Hotel: The following activities are ongoing: Structural steel erection, grouting of hollow core planks, scaffold erection and wrapping, temporary power and lighting installation, above ground storm piping, spray on fireproofing, and exterior framing. The Steel topping off event took place on March 29<sup>th</sup>. Installation of man and material hoist and associated loading dock took place.
- Casino/Podium: The following activities are ongoing: Structural steel erection, slab on metal deck placements, slab on grade placements in the Food Market area, scaffold erection and wrapping, temporary power and lighting installation, spray on fireproofing miscellaneous concrete masonry wall construction, above ground storm piping, roof curb installation and roofing. Underslab MEP in the food market area took place
- 95 and 101 State Street: 95 State Fit-Out began in late January. Interior demolition is ongoing.
- Entertainment block: The following activities are ongoing: steel detailing, concrete on metal deck placements, temporary power and lighting installation, and scaffold erection and wrapping. Structural steel erection, slab on grade placements, spray on fireproofing, miscellaneous concrete masonry wall construction, above ground storm piping, roof curb installation and roofing all took place.
- Plaza: Staging took place for third crane and entertainment steel. Installation of underground storm water tank for irrigation reuse took place between the Armory and French Church.
- Surrounding Streets/Offsite Utilities
  - Main Street: Reflectorized drums have been placed in the south bound lane to shift traffic from 6am-6pm to allow for the unloading of certain materials onto the construction site. The barrels are moved out of the road at the end of each day to allow parking during non-working hours. Two way traffic is maintained at all times and police details are present.
  - Union and Bliss Streets: Sewer lining took place in February.
- Central Electric Facility (CEF): Core and shell construction is underway.
- Model Room: Construction continues on the hotel room mock-up.





### Design Progress

- A 50% construction documents design review workshop was held with the City of Springfield Planning Department and their consultants, Chicago Consultants Studio, at the offices of architect Friedmutter Group on January 24, 2017. A tour and review of the exterior facades and finishes mock-ups also took place at this meeting.
- Design work on the Childcare Center began, with a team led by Massachusetts-based WBE Maryann Thompson Architects.
- Garage construction drawings Addenda 6, 7 and 8 were submitted to the City of Springfield Building Department as updates to the Permit Set.
- Delta 1 to the 95 State Street permit set was issued.
- The 100% submission for the Intelligent Transportation System (ITS) enhancements and roadway lighting mitigation as part of Package 2 (of 2) was submitted by TEC to MassDOT on 3/6/17.

# QUARTERLY STATUS REPORT: JANUARY-MARCH 2017

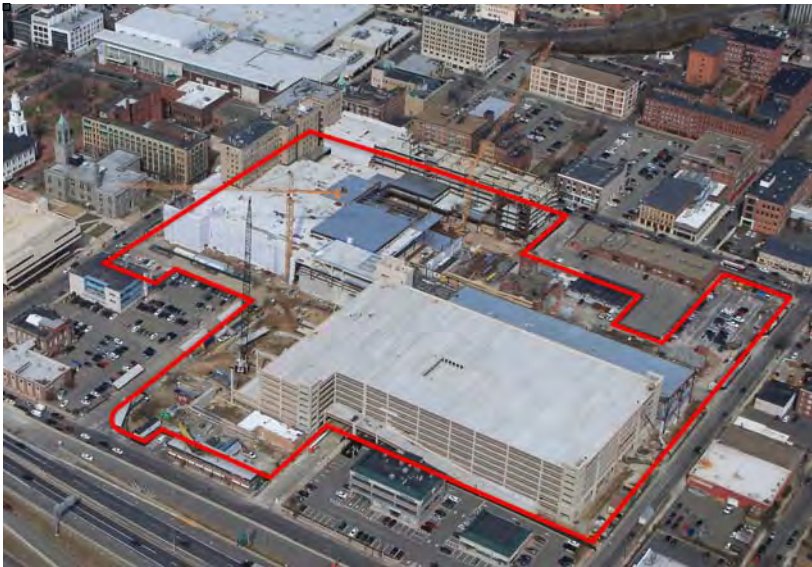
---

## 5b PROGRESS PHOTOGRAPHS

A set of construction site progress photographs as of March 31, 2017 is included in this document as Appendix E. The overall aerial and panoramic views below show progress over the course of the 1st Quarter, including substantial garage precast and podium structural steel erection.



December 14, 2016



March 13, 2017



# QUARTERLY STATUS REPORT: JANUARY-MARCH 2017

---

Parking Garage progress comparison in the last three months:



December 14, 2016



March 13, 2016





# QUARTERLY STATUS REPORT: JANUARY-MARCH 2017

---

Aerial view from Armory over the last three months:



December 28, 2016



February 8, 2017



March 13, 2017





## QUARTERLY STATUS REPORT: JANUARY-MARCH 2017

*135.02.6 The licensee shall have a continuing obligation, pursuant to 205 CMR 120.01(2) to timely provide to the commission an updated permits chart and all documents and information listed in 205 CMR 120.01: Permitting Requirements, as well as any updates to the MEPA process such that the commission is continuously apprised of all material developments with respect to all permits and approvals required for the gaming establishment. Pursuant to 205 CMR 120.01(1)(h) the licensee shall provide to the commission copies of any appeal within 20 days of filing, whether to a municipal or state entity or for judicial review, filed with respect to any permit of approval listed in 205 CMR 120.01(1) along with a copy of the docket sheet and each decision on any appeal.*

### 6 PERMITS

The following is the status of required permits and approvals, including local permits issued in the First Quarter of 2017:

AGENCY OR GOVERNING LEGAL AUTHORITY	PERMIT, REVIEW, OR APPLICATION	DATE APPLICATION SUBMITTED OR ESTIMATED ANTICIPATED APPLICATION DATE
<b>FEDERAL</b>		
1. US Environmental Protection Agency (EPA)	USEPA Construction General Permit	Permit received 2/23/15: USEPA MAR120000
	NPDES General Permit	Permit for Main St. and East Columbus Ave. received 3/9/15: MAR12B410
	NPDES Remediation General Permit (RGP)	Based on foundation design, no permit is expected to be required.
2. Federal Aviation Administration	Determination of No Hazard to Air Navigation	Approval letters received April 13, 2016: 2016-ANE-471-OE for Hotel/Casino 2016-ANE-471-OE for Parking Garage
		Approval letters received July 14, 2016 for Tower Crane and Liebherr 1250 Crawler Crane
	Form 7460-2: Notice of Actual Construction or Alteration	To be e-filed for Hotel/Casino and Parking Garage within 5 days after the construction reaches its greatest height.
<b>STATE</b>		
1. Massachusetts Gaming Commission	Gaming License	Received 11/7/14
	Findings issued pursuant to M.G.L. ch. 30 sec. 61	Section 61 Findings issued by MGC on Dec. 17, 2015.
	Site Plan Approval	Final Design/Site Plan approved by unanimous vote at meeting on May 12, 2016.

## QUARTERLY STATUS REPORT: JANUARY-MARCH 2017

2. Executive Office of Energy and Environmental Affairs	Massachusetts Environmental Policy Act (MEPA) Review	Certificate on Final Environmental Impact Report Received 12/31/14 (EEA 15033); Certificate on Notice of Project Change (NPC) finding no Supplement Environmental Impact Report required issued 11/25/15.
3. Massachusetts Department of Environmental Protection (MA DEP)	Underground Injection Control (UIC) BRP WS-06	To be filed at project completion
	Construction Dewatering Permit	Based on foundation design, no permit is required as groundwater can be managed internal to the site boundary. A permit will be pursued if any deeper excavation is required.
4. Massachusetts Historical Commission (MHC)	Review of project relative to potential effects of State Register historic/ archeological resources	Final Memorandum of Agreement Approved by MGC on December 17, 2015 and Signed by MHC on December 18, 2015.
5. Massachusetts Department of Transportation (MassDOT)	Findings pursuant to M.G.L c. 30, sec. 61	Section 61 Findings issued by MassDOT on March 28, 2016.
	Category III Application for Permit to Access State Highway – Package 1 of 2	MGM submitted a 25% design package and Design Exception Report for MassDOT review on 2/8/16– assumed to be a Category III Application for Permit to Access State Highway. Comments on the 25% level package received 4/11/16. Comments were addressed in a 75/100% design package submitted for MassDOT's review on 5/23/16. PS&E design package submitted 9/7/16 for MassDOT's review. Minor comments received and incorporated in final submission of 10/20/16. Highway Access Permit #2-2016-0079 granted on 11/9/16 for construction of multimodal roadway and traffic control improvements for all work affecting the State's infrastructure.
	Category III Application for Permit to Access State Highway – Package 2 of 2	The 25/75% submission for the Intelligent Transportation System (ITS) enhancements and roadway lighting mitigation as part of Package 2 was submitted to MassDOT on 12/2/16. Comments were received from MassDOT's District 2 office in early 2017. The 100% PS&E drawings incorporating those comments were submitted on 3/6/17.
6. Massachusetts Dept. of Housing & Community Development	Chapter 121A Designation as an Urban Redevelopment Project	Approval letter received 12/31/14



## QUARTERLY STATUS REPORT: JANUARY-MARCH 2017

7. Massachusetts Department of Public Safety	New Elevator Construction Permit	New installation of direct hydraulic freight elevators at 1200 Main Street, 2/6/17: ELV17-0331 and EV17-0328
		New installation of direct hydraulic freight elevators at 1200 Main Street, 2/28/17: ELV17-0493 and ELV17-0494.
		New installation of traction passenger elevators at 1200 Main Street-Parking Garage, 3/20/17: ELEV17-0644, ELEV17-0645, ELEV17-0646, ELEV17-0648, ELEV17-0649, ELEV17-0650, ELEV17-0606, ELEV17-0607.
	Certificate For Use of Man/Material Hoist	Certificate for Use of Elevator, 1441 Main Street, 3/21/17: INS-088733 and INS088738
	Storage Permit	Not required per 527 CMR 9.00. No fuel tanks in excess of 10,000 gallons are expected to be included in the project.
8. Commonwealth of Massachusetts-Dept. of Fire Services-Office of State Fire Marshall	Storage Tank Removal Permit	None this reporting period.
9. Massachusetts Division of Fisheries and Wildlife	Natural Heritage and Endangered Species Prog.	Filing exemption for Memorial Bridge improvements received on 6/21/16.
<b>LOCAL PERMITS AND APPROVALS UPDATE FOR JANUARY-MARCH, 2017</b>		
1. City of Springfield Department of Public Works – Engineering Division	Non-Excavation Occupancy	Temporary fencing around the perimeter of 95 State Street, 1/27/17: 20170099
		Temporary fencing around the perimeter of MGM property - new permit replacing 20160883, 1/27/17: 20170099.
2. City of Springfield – Code Enforcement/Building Division	Building Permit Alteration	Alter 100,100 sq. ft. of a full renovation of floors 1-8 and core and shell renovations for floors 9-11; exterior envelope repairs and upgrades; and the installation of new mechanical systems and life safety systems at 95 State Street, 12/28/16 (not reported last quarter): 16BLDOT-00273AL
	Permit To Do Plumbing	Basement 12 roof top drain at 95 State Street, 12/23/16 (not reported last quarter): 16BDOT-00874PL
		Cross connection / mop sink / water piping / safety shower / 3 prv's at 12 MGM Way, 1/27/17: 17BDOT-00058PL
	Building Permit – Sheet Metal	Install sheet metal for new central utility plant, 3/1/17: 17BDOT-00020SM

## QUARTERLY STATUS REPORT: JANUARY-MARCH 2017

City of Springfield – Code Enforcement/Building Division, cont'd	Building Permit – Sheet Metal, cont'd	Install AHU's and trunkline to VAV's between Union and State Street, 3/22/17: no permit number.
	Permit To Do Electrical Wiring	3 Feeder @ 250A 13800 - Generator / Service at 12 MGM Way, 1/18/17: 17BDOT-00138EL
		Wiring of HVAC controls on all floors at 34 MGM Way, 2/3/17: 17BDOT-00292EL
		Suite 701-Install card reader / electric lock / release button at 101 State Street, 2/7/17: 17BDOT-00304EL
Permit To Do Gas Piping	Install 6 2,934,000 BTU generators / 6 40,000,000 BTU boilers at 12 MGM Way, 1/27/17: 17BDOT-00097GA	
3. City of Springfield Historical Commission	MHC Review Concurring Party; Demolition Delay	SHC approved changes to design for purposes of historic resources and revised MOU on 10/23/15.
4. Springfield City Council	Overlay District Special Permit	Overlay District Special Permit approved by City Council on December 22, 2015.
	Site Plan Review	MGM Site Plan submission deemed completed on November 23, 2015. The City Council voted to approve the plan on 2/22/16.
	Amendments to HCA	Amendment No. 1 approved by Council vote on 6/22/15. Amendment No. 2 approved by Council vote on 2/22/16.
	Public Way Discontinuance Approval	The City Council voted to approve street discontinuances of both Bliss and Howard Streets on 1/26/16.
5. City of Springfield Department of Health and Human Services	Food Service Establishment Permit	TBD as venues are finalized
6. City of Springfield – Forestry Division	Municipal Tree Work Permit	None this reporting period.
7. Springfield Water and Sewer Commission		None this reporting period
8. City of Springfield – Fire Prevention Bureau	Sprinkler Shut Down	None this reporting period.
	Installation of Above Ground Storage Tank Permit(s)	To be filed at installation of emergency generators and fire pump.
	Fuel Oil, Gasoline and Diesel Fuel Storage Permit	To be filed prior to occupancy of the Parking Garage.
9. City of Springfield – Conservation Comm.	Wetlands Protection Act Filing Exemption	None this reporting period.



## QUARTERLY STATUS REPORT: JANUARY-MARCH 2017

---

*135.02.7 In furtherance of specific goals for the utilization of minorities, women and veterans on construction jobs, the licensee shall send and provide a copy to the commission, to each labor union or representative of workers with which the licensee has a collective bargaining agreement or other contract of understanding, a notice advising the labor union or workers representative of the licensee's commitments pursuant to M.G.L. c. 23K §(15) and §§21(a)(21) and (22).*

---

### 7 ORGANIZED LABOR LETTER

The Project Labor Agreement (PLA) was executed on February 26, 2015. Article XVIII on Page 25 of the Agreement states the construction manager and labor unions' commitment to comply with Owner's Diversity and Affirmative Marketing Program as adopted on January 22, 2015.

A copy of the executed PLA is available to the Massachusetts Gaming Commission's Representative for review.

*135.02.8 Prior to the gaming establishment opening for business, in furtherance of specific goals for the utilization of minority business enterprises, women business enterprises and veteran business enterprises as vendors in the provision of goods and services to the gaming establishment, the licensee shall provide to the commission an affirmative marketing plan in which the licensee identifies specific goals, expressed as an overall program goal applicable to the total dollar value of contracts entered into, for the utilization of minority business enterprises, women business enterprises and veteran business enterprises to participate as vendors in the provision of goods and services procured by the gaming establishment and any businesses operated as part of the gaming establishment; provided, however, that the specific goals for the utilization of such minority business enterprises, women business enterprises and veteran business enterprises shall be based on the availability of such minority business enterprises, women business enterprises and veteran business enterprises engaged in the type of work to be contracted by the gaming licensee.*

---

### 8 OPERATIONAL PHASE DIVERSITY PROGRAM FOR EQUAL OPPORTUNITY

MGM's Diversity and Affirmative Marketing Program was approved on January 22, 2015. MGM will comply with this program to meet goals for Diversity participation in the operational phase of the project.

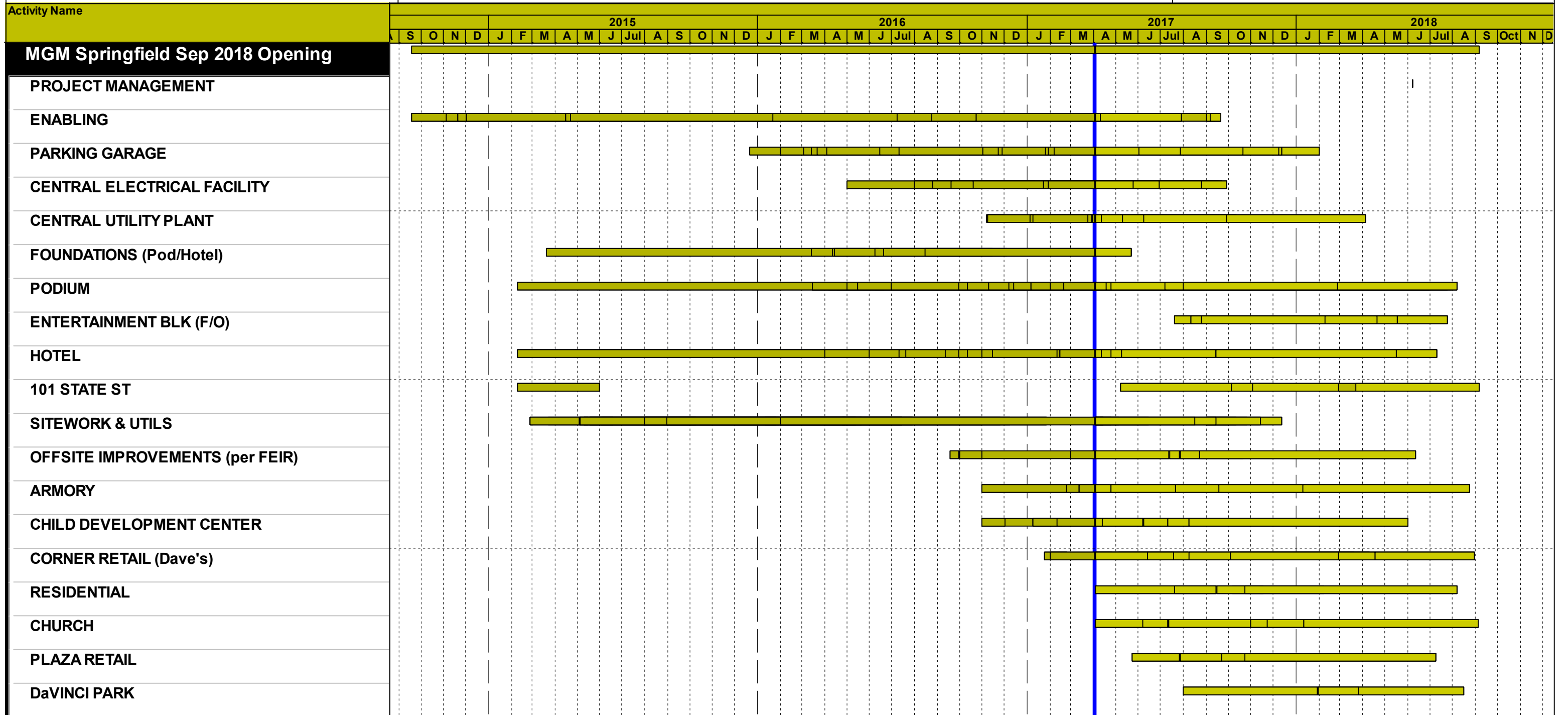


APPENDIX A

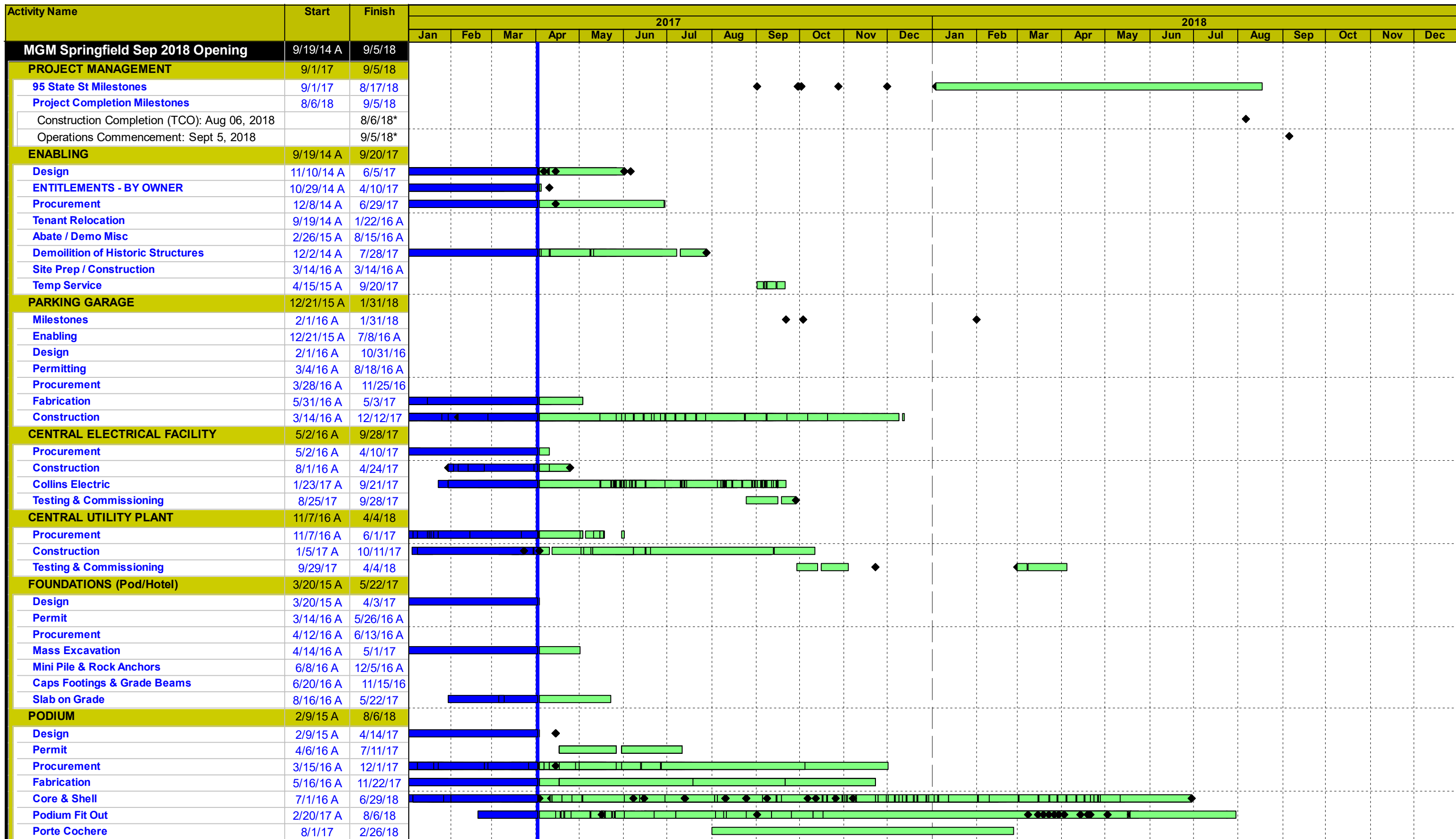
LEVEL 1 AND LEVEL 2 PROJECT SCHEDULES

APRIL 5, 2017 (DATA DATE APRIL 2, 2017)

# MGM Springfield Project Schedule

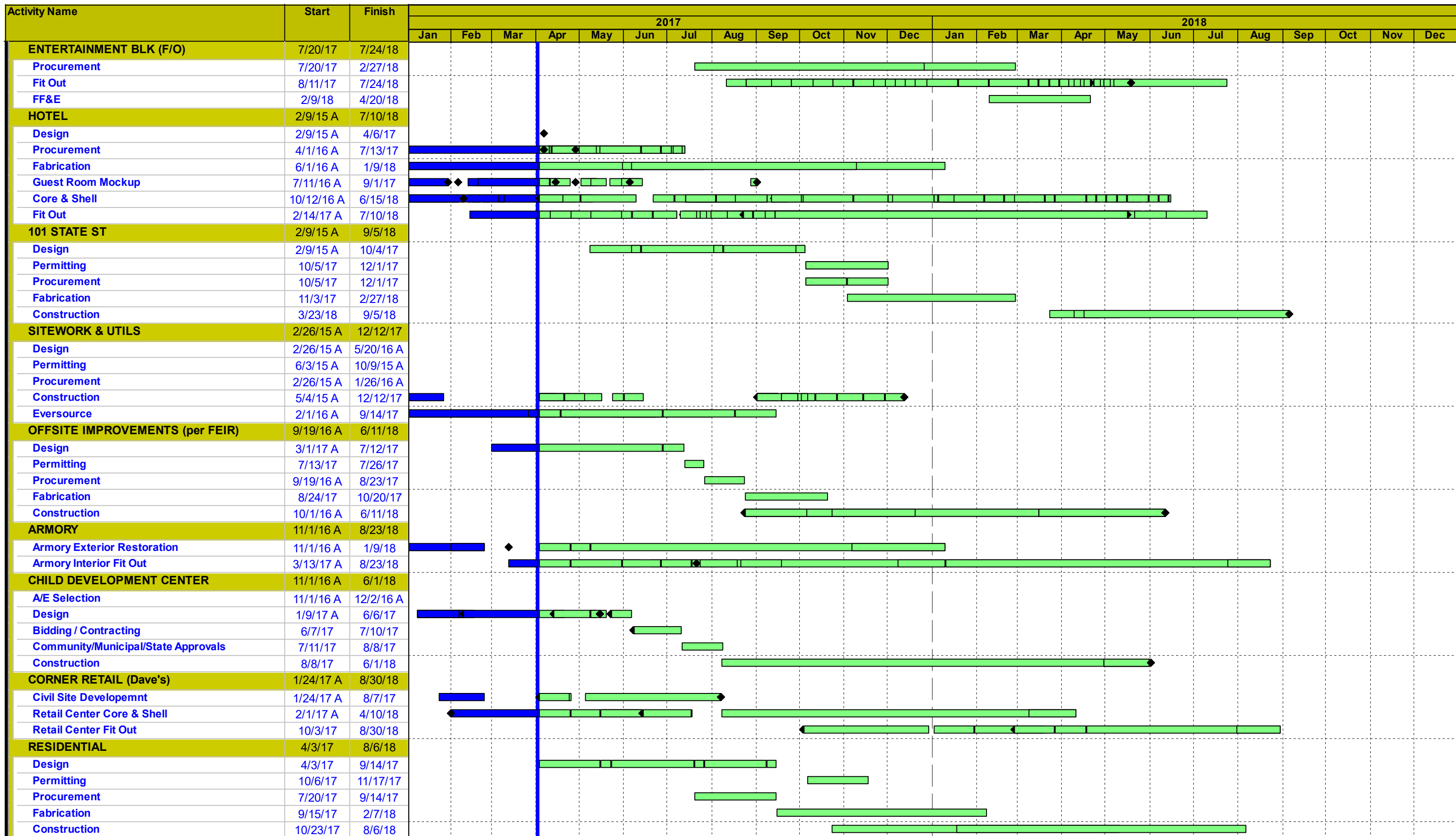






- Actual Work
- Remaining Work
- Critical Remaining Work
- Milestone









- █ Actual Work
- █ Remaining Work
- █ Critical Remaining Work
- ◆ Milestone





Activity Name	Start	Finish	2017												2018											
			Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
			<b>CHURCH</b>	4/3/17	9/4/18																					
Church Exterior Restoration	4/3/17	12/11/17				█	█	█	█	█	█	█	█	█	█											
Church Interior Fit Out	7/11/17	9/4/18																								
Plaza Infrastructure	7/11/17	9/4/18																								
<b>PLAZA RETAIL</b>	5/23/17	7/9/18																								
Design	5/23/17	7/26/17																								
Permitting	7/27/17	9/21/17																								
Procurement	7/27/17	9/21/17																								
Fabrication	9/22/17	1/31/18																								
Construction	10/23/17	7/9/18																								
<b>DaVINCI PARK</b>	8/1/17	8/16/18																								
Design	8/1/17	1/29/18																								
Permitting	1/30/18	3/26/18																								
Procurement	1/30/18	3/26/18																								
Fabrication	1/30/18	3/26/18																								
Construction	3/27/18	8/16/18																								

 Actual Work  
 Remaining Work  
 Critical Remaining Work  
 Milestone



APPENDIX B

PRESENTATION TO THE ACCESS AND OPPORTUNITY COMMITTEE OF APRIL 11, 2017



# Access and Opportunity Committee

April 11, 2017



# Agenda

1. Outreach Update
2. Construction Workforce
3. Design Commitments
4. Construction Commitments





# Outreach Update



# OUTREACH UPDATE

1. Outreach to MBE, WBE & VBE Companies
2. Community Partners Network
3. Union Partnership & Outreach
4. Other Diversity Outreach Work
5. Upcoming Events



# OUTREACH TO MBE, WBE & VBE COMPANIES

## Construction:

Ref	Company	Location	Diversity Status
1	Baron Industries, Inc.	Woburn, MA	VBE
2	Capasso Restoration	North Haven, CT	WBE
3	CK Flooring	Chicopee, MA	WBE
4	Dagle Electrical Construction Corp.	Melrose, MA	WBE
5	Eagle Elevator Company, Inc.	Boston, MA	VBE
6	EDM Construction Co.	Merrimack, MA	WBE
7	Markings, Inc.	Pembroke, MA	WBE
8	Piping Systems, Inc.	Assonet, MA	WBE
9	Professional Drywall Co.	West Springfield, MA	WBE
10	Protocol Management Services	North Attleboro, MA	WBE
11	Superior Caulking & Waterproofing, Co. Inc.	Palmer, MA	VBE
12	Titan Roofing	Springfield, MA	MBE

## Supplier:

13	C4 Cables	Taunton, MA	WBE
----	-----------	-------------	-----

### Notes:

(1) Baron Industries Inc. is also a supplier.

# COMMUNITY PARTNERS NETWORK

Ref	Organization	Location
1	A.W.A.K.E. Inc.	Springfield, MA
2	Association of Black Businesses & Professionals	Springfield, MA
3	Betterman Construction, Inc.	Springfield, MA
4	Carpenters Union #108	Springfield, MA
5	Community Works	Springfield, MA
6	Corporation for Public Management	Springfield, MA
7	East African Cultural Center	Springfield, MA
8	Gandara Springfield Family Resource Center	Springfield, MA
9	HAP Housing	Springfield, MA
10	Ironworkers Union #7	Springfield, MA
11	Laborers #999	Springfield, MA
12	Lighthouse/ Human Resources Unlimited	Springfield, MA
13	Neighbor to Neighbor	Springfield/Holyoke, MA

**Notes:**

(1) 2 new community based organizations joined this month.



# COMMUNITY PARTNERS NETWORK

Ref	Organization	Location
14	Springfield Veterans Services Dept.	Springfield, MA
15	STCC Workforce Development Department	Springfield, MA
16	Training Resources of America	Western Massachusetts
17	Uptown Construction Collaborative	Springfield, MA
18	Urban League of Greater Springfield	Springfield, MA
19	Veteran's Inc.	Springfield, MA
20	We The Villagers	Springfield, MA
21	Western Mass. COSH	Western Massachusetts
22	Western Mass. Employment Collaborative	Springfield, MA
23	Westover Job Corps.	Westover, MA
24	Young Urban Engineering Entrepreneurship Academy	Springfield, MA
25	YWCA/Youth Build	Springfield, MA

**Notes:**

(1) 2 new community based organizations joined this month.

# COMMUNITY PARTNERS NETWORK

**March 1, 2017:** Community Partners Network Meeting

## Meeting Highlights:

- 14 Community Partners attended
- Solidified training topics for the Work Readiness trainings
- Reviewed Upcoming Union Apprenticeship Enrollment/Application Dates and had discussions with Carpenters #108 and Laborers #999 about partnership on outreach event and promotions around next cycle





# COMMUNITY PARTNERS NETWORK

- Finalizing the 2017 CPN Workplan:
  - Advocacy Items
  - Referrals Update
  - Trainings needed/to be offered
  - Union Outreach Events/ Collaboration
  - Working with the MGM Springfield Operations Team on Operations Hiring
  - Outreach Campaign & Membership Drive
  - On-Site Union Presentations (at the home of partnering CBO's)
- Information Sessions: Organizations in the CPN were given time to share information with each other on upcoming events and activities of their organization in relation to workforce development/readiness.
- Introductory and Diversity meeting with Baystate Medical Center to begin formalizing a partnership with the CPN to increase diversity on their upcoming construction projects.



# COMMUNITY PARTNERS NETWORK UPDATES

## Action Teams Updates

### Membership Team:

- 3 Month Membership Drive for new community based organizations (CBO's).
- 3 Month Membership Drive of new Owners/Developers.





# COMMUNITY PARTNERS NETWORK UPDATES

## Action Teams Updates

### Advocacy Team:

- Advocacy work regarding work with Baystate Medical Center to adapt specific diversity goals and partner with the CPN on Construction Diversity for their new developments.
- Continuing to reach out to local General Contractors and Construction projects in the region to meet with those owners and GC's about Diversity Hiring and Contracting.
- Meetings w/local trade unions.



# COMMUNITY PARTNERS NETWORK UPDATES

## Action Teams Updates

### Work Readiness/Success Team:

- Coordination and tracking of non-eligible union applicants.
- Coordination and tracking of union eligible applicants.
- Working with MGM and other developers to share the Union Labor Pool list of diverse union members looking to work.
- Tracking placement in unions, apprenticeship programs, and regional job sites.
- Coordinating supportive services for non-eligible union referrals.
- Partnering with Carpenters #108 and Laborers #999 to promote upcoming apprentice enrollment dates.
- Management of CPN Work Readiness/Union Eligibility trainings, workshops, information sessions.





# UNION PARTNERSHIP & OUTREACH

## Continued meetings and discussions with local trade unions to include:

- Assistance with targeted diversity recruitment based on the needs of the individual trade union.
- Assistance with upcoming new Union Apprenticeship Enrollment events.
- Partnerships on upcoming outreach events.
- Addressing challenges of newly accepted union members and working with a community sponsor to assist in retaining new members.
- Sharing the MGM Labor Pool of eligible diverse union members looking for work as the unions ramp up on the MGM Springfield project and other local construction projects.





# UNION PARTNERSHIP & OUTREACH

## Continued referrals and tracking of new diverse union applicants in their union application process.

- Capturing and tracking success stories and highlights.
- Continued referrals and tracking of new diverse union applicants in their union application process.
- **9 newly identified union members** looking for work identified through outreach and added to the MGM Springfield Available Labor Pool list and shared with Tishman Construction and MGM Springfield Sub-Contractors looking for union workers.





# OTHER DIVERSITY WORK & OUTREACH/ EVENTS

## March 1, 2017: MGM Springfield Vendor Outreach Session: FF&E focused

- Over 250 Registered
- 200 Actual Attendees
- Certification Partners and Mass. Gaming Commission's information tables added value to participants looking to gain information on how to get certified as a diverse company, and how to register with the Mass. Gaming Commission
- FAQ Developed to post on website
- Business Roundtables received positive feedback from attendees





# OTHER DIVERSITY WORK & OUTREACH/ EVENTS

## March 1, 2017: MGM Springfield Vendor Outreach Session: FF&E focused

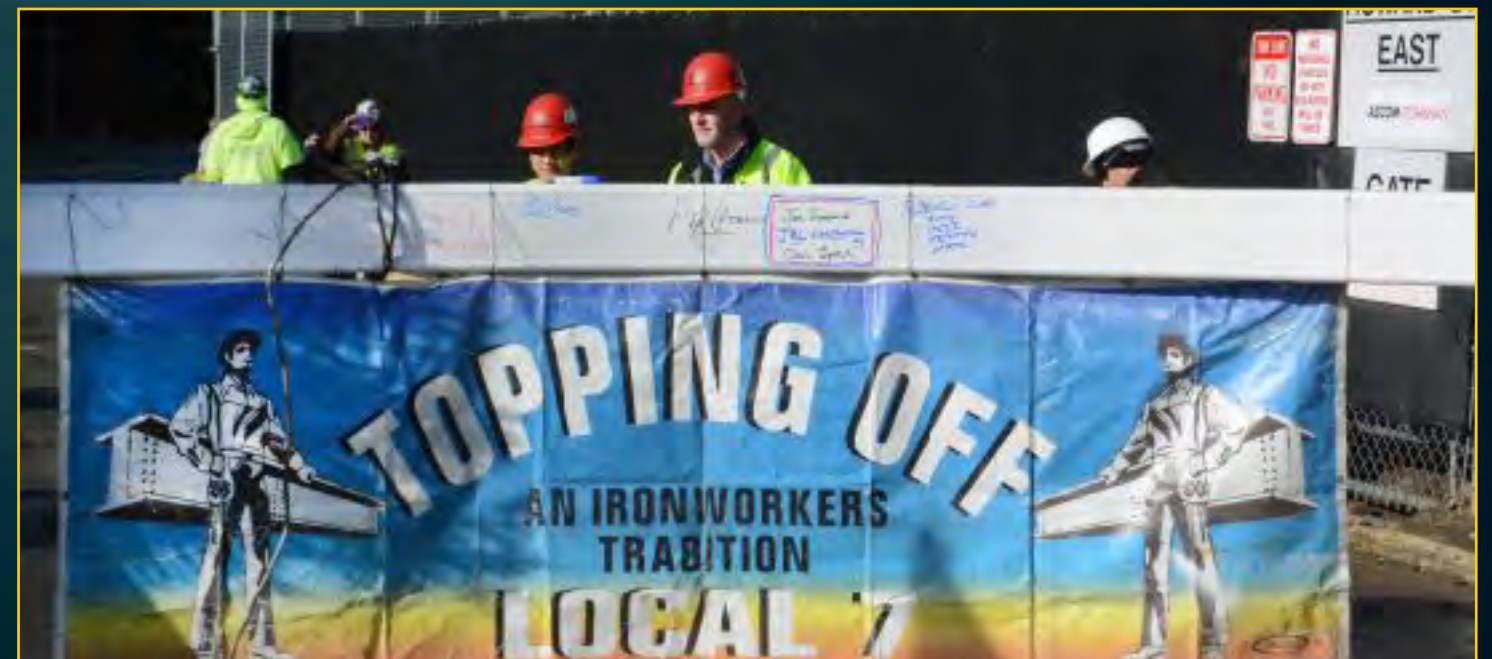
- Chamber members Luncheon held on 2/28/17
- Reviewed sourcing information slating against timeline
- Great leads for future opportunities
- Continued engagement for future outreach
- Lessons learned
- Updated website, online registration and post FAQ for Operations





# OTHER DIVERSITY WORK & OUTREACH/ EVENTS

**March 29, 2017:** MGM Springfield Topping Off Ceremony:





# OTHER DIVERSITY WORK & OUTREACH/ EVENTS

**March 29, 2017:** MGM Springfield Topping Off Ceremony:





# OTHER DIVERSITY WORK & OUTREACH/ EVENTS

## **Tishman Construction & Putnam Vocational Academy:** Student Construction Program On Site Tour and Classroom Experience

- Nine (9) students participating in mentorship
- Students will be divided into 2 groups
- Dates for project visits:
  - Group A: 4/10/17 & 5/03/17
  - Group B: 4/13/17 & 5/15/17





# OTHER DIVERSITY WORK & OUTREACH/ EVENTS

## Ongoing Diversity Work:

- Participation in the Western Mass. Girls In Trades Fair Planning Group
- Working with the Association of Black Businesses & Professionals on the Springfield Interise Program for capacity building for diverse companies
- CPN Phon-A-Thon held 3-22-17; 158 calls made to new website and union referrals from community partners
- Workforce and subcontracting reviews with Tishman Construction:
  - Daily Badging Reports
  - Workforce Projections
  - Diverse Spend Review & Projections
  - Issues with Unions or Subcontractors in meeting diversity goals
  - Upcoming Scopes of Work

**AECOM TISHMAN**



# OTHER DIVERSITY WORK & OUTREACH/ EVENTS

## Ongoing Diversity Work:

- Diversity Kick-Off and Review/Assistance Meetings with new and current subcontractors on the job site:
- **For New Subs:** Diversity of their workforce, and/or areas where they will need assistance, past diversity performance on other jobs, what union (s) they will be calling on for workforce, and review of any diverse spend commitments
- **For Current Subs:** Review of diversity goals that they have challenges in meeting, discuss ways to assist subs who are low on a specific diversity goal, and review of any diverse spend commitments





# OTHER DIVERSITY WORK & OUTREACH/ EVENTS

## Ongoing Diversity Work:

- MGM Springfield Construction Team Announces Union Construction Worker Office Hours

## Outreach Will Include:

- Appearances and Radio PSA's at the local community radio stations
- Ads in the cultural and neighborhood newspapers
- Regular posting on all social media, facebook, websites
- Emailing all our community partners
- Sharing flyer with all trade unions
- Sharing flyer with local vocational schools



**BUILDING A STRONG FOUNDATION**

ARE YOU A UNION TRADESPERSON INTERESTED IN WORKING ON THE MGM SPRINGFIELD PROJECT?

Effective January 31, MGM Springfield will host office hours every Tuesday and Friday from 9:30 AM until 11:00 AM for union tradespeople interested in work on the Springfield project. These 20 minute 1 on 1 informational meetings are by appointment only. MGM Springfield construction staff will explain the process for working on the job site and will take the opportunity to learn about your trade history and experience. Minority, women, veteran, and local western Massachusetts' union tradespeople are strongly encouraged to attend.

When: Tuesdays and Fridays  
20-minute slots available from 9:30 a.m. to 11:30 a.m.

**BY APPOINTMENT ONLY**  
To schedule an appointment, email [cbrown@mgmspringfield.com](mailto:cbrown@mgmspringfield.com)

Where: MGM Springfield Construction Office  
101 State Street, Suite 701  
Springfield, MA 01144



# OTHER DIVERSITY WORK & OUTREACH/ EVENTS

## Ongoing Diversity Work:

- MGM Springfield Open Call for Meetings with Diverse Businesses

## Outreach Will Include:

- Appearances and Radio PSA's at the local community radio stations
- Ads in the cultural and neighborhood newspapers
- Regular posting on all social media, facebook, websites
- Emailing all our community partners
- Periodic email blast/mailings to our Gaming & Diversity Certification partners: Greater New England Minority Supplier Development Council, Mass. Supplier Diversity Office, WBENC, U.S. Dept. of Veteran Affairs, and Mass. Gaming Commission
- Periodic email blast/mailings to our Business Partners and Chamber of Commerce's

**OPEN CALL!**  
**Minority, Women, and Veteran Owned Businesses**

MGM Resorts International is committed to providing access to opportunities for certified minority, women, and veteran owned businesses in the construction of MGM Springfield.

If you are a MBE, WBE or VBE contractor interested in working with MGM Springfield our construction team wants to meet with you.

In addition to learning about your company, we will provide you with information on:

- Pre-Qualification Process and requirements
- Construction plans and timeline
- Certifying your business as a MBE, WBE or VBE w/approved MGC approved certifying agencies

1-on-1 meetings with our team will be scheduled on an ongoing basis by appointment only.

To schedule an appointment, please contact:  
Chelan Brown  
Diversity Specialist  
[cbrown@mmspringfield.com](mailto:cbrown@mmspringfield.com)  
413-273-5926

**MGM Springfield, Building Excitement**

# DIVERSITY SUCCESS STORIES

## MGM Springfield Union Construction Worker March 2017 Highlight:

### Michelle Campbell, WBE/MBE

- Carpenters Local 43





# Construction Workforce



# WORKFORCE DIVERSITY STATISTICS - UNION

## AS OF MARCH 30, 2017

Group	Project Goals	Project To Date %
Women	6.90%	8.87%
Minority	15.30%	28.62%
Veteran	8.00%	9.10%

Notes:

(1) Statistics include all workforce reports that were received by MGM as of March 30, 2017.



# WORKFORCE DIVERSITY STATISTICS - TOTAL

## AS OF MARCH 30, 2017

Group	Project Goals	Project To Date %
Women	6.90%	10.27%
Minority	15.30%	24.07%
Veteran	8.00%	10.37%

**Notes:**

- (1) Statistics include all workforce reports that were received by MGM as of March 30, 2017.
- (2) The Diversity plan approved by the MGC allows reporting to include hours allocated to multiple diversity categories. 6.52% of total workforce hours are included in two of the diversity categories and 0.30% of total workforce hours are included in three diversity categories.
- (3) While this is not a reporting requirement of the approved diversity plan, the total hours worked through 1st Quarter 2017 is as follows:
  - Approximately 38% are from Springfield/ Surrounding Communities
  - Approximately 59% are from Western Massachusetts
  - Approximately 82% are from Massachusetts

# WORKFORCE 3 MONTH LOOK AHEAD

1. **Work in Progress** - Water/Sewer/Gas/Electric Infrastructure
2. **Work in Progress** - Generator Switch Gear Area
3. **Work in Progress** - Concrete Slab on Grade for Podium
4. **Work in Progress** - Garage Erection
5. **Work in Progress** - Hotel Concrete Plank Installation
6. **Work in Progress** - Temp Heating
7. **Work in Progress** - Interior Fitout of 95 State
8. **Work in Progress** - Scaffolding
9. **Work in Progress** - Spray Fireproofing
10. **Work in Progress** - Concrete Slab on Metal Deck
11. **Work in Progress** - CEF Masonry
12. **Work in Progress** - Garage Interior MEP, Sprinklers, Storm
13. **Work in Progress** - MEP Distribution for Podium
14. **Work in Progress** - Interior Masonry
15. **Work in Progress** - Garage Elevators
16. **Work in Progress** - Podium roofing
17. Apr 2017 - Building Enclosure
18. Apr 2017 - Exterior Framing
19. Apr 2017 - Major Equipment for Central Plant
20. May 2017 - Interior Framing
21. June 2017 - Hotel MEP



# Design & Construction Commitments



# DESIGN & CONSTRUCTION COMMITMENTS

## AS OF MARCH 31, 2017

Group	Project Goals	Commitments	Variance	Company Count	Value
WBE	10.0%	16.6%	6.6%	58	\$55.63M
MBE	5.0%	7.7%	2.7%	32	\$25.87M
VBE	2.0%	5.3%	3.3%	19	\$17.79M

**Notes:**

(1) Total Commitments through March 31, 2017 are \$335.3M.

(2) Includes companies that are certified with the following agencies:

- MBE - Massachusetts Supplier Diversity Office or Greater New England Minority Supplier Development Council.
- WBE - Massachusetts Supplier Diversity Office or Women's Business Enterprise National Council.
- VBE - United States Department of Veteran Affairs or Massachusetts Gaming Commission.

WBE = Woman-owned Business Enterprise; MBE = Minority-owned Business Enterprise; VBE = Veteran-owned Business Enterprise.



# Design & Consulting Commitments



# DESIGN & CONSULTING COMMITMENTS

## AS OF MARCH 31, 2017

Group	Project Goals	Commitments	Company Count	Value
WBE	10.0%	15.3%	14	\$6.04M
MBE	5.0%	12.7%	14	\$5.03M
VBE	2.0%	7.1%	3	\$2.79M

Notes:

(1) Total Commitments through March 31, 2017 are \$39.5M.

(2) Includes companies that are certified with the following agencies:

- MBE - Massachusetts Supplier Diversity Office or Greater New England Minority Supplier Development Council.
- WBE - Massachusetts Supplier Diversity Office or Women's Business Enterprise National Council.
- VBE - United States Department of Veteran Affairs or Massachusetts Gaming Commission.

WBE = Woman-owned Business Enterprise; MBE = Minority-owned Business Enterprise; VBE = Veteran-owned Business Enterprise.



# DESIGN & CONSULTING COMMITMENTS

## AS OF MARCH 31, 2017

Ref	Company	Scope	Location	Diversity Status
1	AAC Investments, LLC	Interior Design	Los Angeles, CA	WBE
2	AFO Project Consulting, LLC	Construction Consulting	Las Vegas, NV	VBE
3	Akal Engineering, Inc.	MEP Consulting Engineering Services	Boylston, MA	MBE
4	Andelman & Lelek Engineering, Inc.	Energy Modeling	Norwood, MA	WBE
5	Blackford, LLC	Construction Management	Las Vegas, NV	VBE
6	Black Hawk Group	Consulting Engineer Services	Philadelphia, PA	MBE
7	C&C Consulting Engineers, LLC	Structural Peer Review	Allston, MA	MBE
8	Calvin Consulting Services, LLC	Construction Consulting	Las Vegas, NV	WBE
9	Communications for Design LLC	Design and Project Management Support Services	Northfield, MN	WBE
10	Convergent Technologies	Acoustics/ Audio Visual/ IT/ Low Voltage	Lockport, NY	WBE
11	Copley Wolff Design Group, Inc.	Full Landscape Architectural Services	Boston, MA	WBE
12	Desert Construction Consulting, Ltd	Estimating and Contractor Bidding Services	Henderson, NV	MBE
13	Desman, Inc.	Parking Garage Bridging Documents (LOA)	Boston, MA	MBE
14	Dietz & Company Architects, Inc.	Full Service Architecture and Interior Design	Springfield, MA	WBE
15	Engineers Design Group, Inc.	Structural Engineering Consulting Services	Malden, MA	MBE
16	Erin Chrusciel Photography, LLC	Photography	East Longmeadow, MA	WBE

**Notes:**

(1) Includes companies that are certified with the following agencies:

- MBE - Massachusetts Supplier Diversity Office or Greater New England Minority Supplier Development Council.
- WBE - Massachusetts Supplier Diversity Office or Women's Business Enterprise National Council.
- VBE - United States Department of Veteran Affairs or Massachusetts Gaming Commission.

(2) Green highlighted companies have been paid as of February 28, 2017.

WBE = Woman-owned Business Enterprise; MBE = Minority-owned Business Enterprise; VBE = Veteran-owned Business Enterprise.

# DESIGN & CONSULTING COMMITMENTS

## AS OF MARCH 31, 2017

Ref	Company	Scope	Location	Diversity Status
17	Fernandez & Associates	Fire Protection Design and Code Consulting Services	Byfield, MA	MBE
18	JoAnn Jones	Administrative Services	Henderson, NV	WBE
19	Marshall Moya Design, LLC	Architectural Services	Washington, DC	MBE
20	MCLA, Inc.	Lighting	Washington, DC	WBE
21	Nitsch Engineering, Inc.	Engineering Services	Boston, MA	WBE
22	Pristine Engineers, Inc.	MEP Peer Review Services	Raynham, MA	MBE
23	Renderready, LLC	Rendering and Graphic Design	Albuquerque, NM	MBE
24	Soden Sustainability Consulting, LLC	LEED	Winchester, MA	WBE
25	Spec's Design Group, LLC	Interior Design	Springfield, MA	WBE
26	Stevens & Associates	Façade Stabilization Design	Brattleboro, VT	VBE
27	Timothy Haahs & Associates, Inc.	Architect and Engineer of Record/ Parking Consultant	Blue Bell, PA	MBE
28	US Inspection & Consulting, LLC	Construction Inspections	Lake Havasu City, AZ	MBE
29	VAV International, Inc.	Mechanical Consulting	Woburn, MA	MBE
30	WA Architects, Inc.	Architectural Services	Cleveland, OH	MBE
31	YA Construction Services, LLC	MEP Peer Review	St. Louis, MO	WBE

### Notes:

(1) Includes companies that are certified with the following agencies:

- MBE - Massachusetts Supplier Diversity Office or Greater New England Minority Supplier Development Council.
- WBE - Massachusetts Supplier Diversity Office or Women's Business Enterprise National Council.
- VBE - United States Department of Veteran Affairs or Massachusetts Gaming Commission.

(2) Green highlighted companies have been paid as of February 28, 2017.

WBE = Woman-owned Business Enterprise; MBE = Minority-owned Business Enterprise; VBE = Veteran-owned Business Enterprise.



# Construction Commitments



# CONSTRUCTION COMMITMENTS

## AS OF MARCH 31, 2017

Group	Project Goals	Commitments	Company Count	Value
WBE	10.0%	16.8%	44	\$49.59M
MBE	5.0%	7.0%	18	\$20.83M
VBE	2.0%	5.1%	16	\$15.00M

Notes:

(1) Total Commitments through March 31, 2017 are \$295.8M.

(2) Includes companies that are certified with the following agencies:

- MBE - Massachusetts Supplier Diversity Office or Greater New England Minority Supplier Development Council.
- WBE - Massachusetts Supplier Diversity Office or Women's Business Enterprise National Council.
- VBE - United States Department of Veteran Affairs or Massachusetts Gaming Commission.

WBE = Woman-owned Business Enterprise; MBE = Minority-owned Business Enterprise; VBE = Veteran-owned Business Enterprise.



# DIVERSE CONSTRUCTION COMPANIES

AS OF MARCH 31, 2017

Ref	Company	Scope	Location	Diversity Status
1	Aces Enterprises, LLC	Steel Plate Supplier	Dunlap, IL	VBE
2	AeroSage, LLC	Materials Fabricator	Tampa, FL	VBE
3	Alares, LLC	Commissioning and Construction Services	Quincy, MA	VBE
4	All American Signs	Signage	Plymouth, MA	VBE
5	Alonzee Consulting	Construction Consulting	Las Vegas, NV	WBE
6	American Environmental, Inc.	Abatement	Holyoke, MA	MBE
7	American Stair Corporation	Stair Supplier	Romeoville, IL	VBE
8	Architectural Products, Inc.	Glass and Glazing	Burlington, CT	WBE
9	Argent Associates, Inc.	Material Vendor	Burlington, CT	WBE
10	Arrow Security Corporation	Security Guard Services	Springfield, MA	VBE
11	Ayala Excavating and Trucking, LLC	Trucking	Springfield, MA	MBE
12	Baron Industries, Inc	Coiling Doors	Woburn, MA	VBE
13	BECO Electrical Contractors, Inc.	Electrical	Monson, MA	VBE
14	Berkshire Concrete Cutting, LLC	Saw Cutting	Torrington, CT	WBE
15	Brican, Inc.	General Contracting Services	Springfield, MA	VBE

**Notes:**

(1) Green highlighted companies have worked on site and been paid as of February 28, 2017.

WBE = Woman-owned Business Enterprise; MBE = Minority-owned Business Enterprise; VBE = Veteran-owned Business Enterprise.

# DIVERSE CONSTRUCTION COMPANIES

## AS OF MARCH 31, 2017

Ref	Company	Scope	Location	Diversity Status
16	C4 Cables	Datacom, Cabling, Fiber Supplier	Taunton, MA	WBE
17	C&C Contractors, LLC	Trucking Services	Springfield, MA	MBE
18	C&D Electronics, Inc.	Cabling, Wiring, Electronics Supplier	Holyoke, MA	WBE/MBE
19	Capasso Restoration, Inc.	Masonry Contractor	North Haven, CT	WBE
20	Chabot & Burnett Construction Co., Inc.	Masonry Contractor	Agawam, MA	WBE
21	CK Flooring Solutions, Inc.	Carpet Installer	Chicopee, MA	WBE
22	CMJ, LLC	Property Management/Maintenance	Springfield, MA	MBE
23	Connecticut Drywall Finishing, Inc.	Drywall	West Springfield, MA	WBE
24	Connecticut Temperature Controls, LLC	Controls	Newington, CT	VBE
25	Coghlin Electrical Contractors, Inc.	Electrical Services	Worcester, MA	WBE
26	C.R. Levesque Trucking Corp.	Hauling & Equipment Transportation	Monson, MA	WBE
27	Dagle Electrical Construction Corp.	Electrical	Melrose, MA	WBE
28	Davenport Advisors, LLC	Property Management/ Maintenance	Boston, MA	MBE
29	Dependable Masonry Construction Company, Inc.	Masonry and Brickpaving	North Reading, MA	MBE
30	Eastern General Contractors, Inc.	General Contractor - Rigging	Springfield, MA	MBE

**Notes:**

(1) Green highlighted companies have worked on site and been paid as of February 28, 2017.

WBE = Woman-owned Business Enterprise; MBE = Minority-owned Business Enterprise; VBE = Veteran-owned Business Enterprise.



# DIVERSE CONSTRUCTION COMPANIES

## AS OF MARCH 31, 2017

Ref	Company	Scope	Location	Diversity Status
31	EDM Construction, Inc.	Carpentry & Structural Steel Erection	Merrimac, MA	WBE
32	E L Waterman, Inc.	Pipe Supplier	Foxboro, MA	WBE
33	Evermore Light & Power, Inc.	Electrical	Somerville, MA	WBE
34	Fabiano Oil Corp.	Fuel & Oil Supplier	Wrentham, MA	WBE
35	Federal Concrete, Inc.	Concrete Services	Hopedale, MA	WBE
36	Fisher Contracting Corporation	General Contracting Services	Worcester, MA	WBE
37	Fletcher Sewer & Drain, Inc.	Inspection - FEIR	Ludlow, MA	WBE
38	Folan Waterproofing and Construction Company, Inc.	Masonry Contractors & Waterproofing	South Easton, MA	WBE
39	Frisoli Electric, Inc.	Electrical	Holbrook, MA	VBE
40	Gomes Construction Co. Inc.	Utility Connections	Ludlow, MA	WBE
41	Granite City Electric Supply Company, Inc.	Electrical Supplier	Quincy, MA	WBE
42	Green Insulation, Inc.	Insulation	Adams, MA	WBE
43	H B Welding, Inc.	Steel, Welding, Iron Work	Johnston, RI	WBE
44	Homeland Mechanical, LLC	Pipe Supplier	Quincy, MA	VBE
45	Industrial Flame Cutting, Inc.	Steel Plate Supplier	Beacon Falls, CT	VBE

**Notes:**

(1) Green highlighted companies have worked on site and been paid as of February 28, 2017.

WBE = Woman-owned Business Enterprise; MBE = Minority-owned Business Enterprise; VBE = Veteran-owned Business Enterprise.

# DIVERSE CONSTRUCTION COMPANIES

## AS OF MARCH 31, 2017

Ref	Company	Scope	Location	Diversity Status
46	JMK Building Supply, Inc	Drywall	Colchester, CT	WBE
47	JRL Construction, Inc.	General Contractor - Demolition	Springfield, MA	VBE
48	Kittredge Equipment Company, Inc.	Kitchen Equipment	Agawam, MA	WBE
49	L.K. Sheet Metal, Inc.	Sheet Metal	East Hartford, CT	WBE
50	Larry's Trucking Co.	Trucking	Springfield, MA	MBE
51	Lindon Group	Piping Materials	East Providence, RI	WBE
52	Markings Inc.	Pavement Marking Services	Pembroke, MA	WBE
53	Medeiros Hydroseeding & Landscaping Construction, Inc.	Trucking and Soil Materials	Monson, MA	MBE
54	Moor Metals, Inc.	Sales and Distribution of Metals	Holliston, MA	MBE
55	Ms. Pipe, LLC	Procurement of Valves, Pipes and Fittings	South Windsor, CT	WBE
56	New England Foundation Company, Inc.	Helical Piles	Boston, MA	WBE
57	Northeastern Steel Corporation	Steel Distributor	Revere, MA	MBE
58	Performance Testing & Balancing LLC	Testing & Balancing	South Hampton, MA	VBE
59	Piping Systems, Inc.	HVAC	Assonet, MA	WBE
60	Protocol Management Services, Inc.	Access Flooring	North Attleboro, MA	WBE
61	R K Insulation Contractors, Inc.	Insulation Services	Hartford, CT	MBE

**Notes:**

(1) Green highlighted companies have worked on site and been paid as of February 28, 2017.

WBE = Woman-owned Business Enterprise; MBE = Minority-owned Business Enterprise; VBE = Veteran-owned Business Enterprise.



# DIVERSE CONSTRUCTION COMPANIES

AS OF MARCH 31, 2017

Ref	Company	Scope	Location	Diversity Status
62	Rebars & Mesh, Inc.	Concrete	Haverhill, MA	WBE
63	Regis Steel Corporation	Steel Erection/ Reinforcing	Fall River, MA	MBE
64	S&F Concrete Contractors, Inc.	Concrete	Hudson, MA	MBE
65	Security Construction Services, Inc.	Fencing	Hudson, MA	WBE
66	SOS Corporation	Construction Cleaning, Selective Interior Demolition	Milford, MA	WBE
67	Steere Engineering, Inc.	Engineering Services	Warwick, RI	WBE
68	Strategic Environmental Services, Inc.	Environmental Consultants	Sutton, MA	WBE
69	Supplies Exchange Systems	Materials Supplier	Dorchester, MA	MBE
70	Tavares, LLC	Fireproofing	Providence, RI	MBE
71	T & M Equipment Corporation	Excavating Contractor	Springfield, MA	VBE
72	Titan Roofing Company	Roofing	Springfield, MA	MBE
73	Triton Leasing and Rental, Inc.	Demolition & Abatement	Feeding Hills, MA	WBE
74	Turtle & Hughes, Inc.	Electrical Supplier	Linden, NJ	WBE
75	Ultimate Abatement Company, Inc.	Abatement	Plainfield, MA	WBE
76	Welch Associates Land Surveyors, Inc.	Land Surveying	West Bridgewater, MA	WBE
77	Willow Tree Outdoor, LLC	Landscape	Springfield, MA	WBE
78	Younger Brothers Construction, LLC	Materials Supplier	Watertown, MA	MBE

**Notes:**

(1) Green highlighted companies have worked on site and been paid as of February 28, 2017.

WBE = Woman-owned Business Enterprise; MBE = Minority-owned Business Enterprise; VBE = Veteran-owned Business Enterprise.

APPENDIX C

CONSTRUCTION WORKFORCE STATISTICS AS OF MARCH 30, 2017



**MGM Springfield**  
**Workforce Diversity Report (By Company)**  
As of: March 30, 2017

Reference	Company	This Month's Workforce Diversity Statistics								Project To Date Workforce Diversity Statistics							
		Employee Count	This Month's Total Hours	Women		Minority		Veteran		Employee Count	Project To Date Total Hours	Women		Minority		Veteran	
				Hours	%	Hours	%	Hours	%			Hours	%	Hours	%	Hours	%
1	Acraom Masonry Enterprises, Inc.	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	13	1,580.50	0.00	0.00%	824.50	52.17%	0.00	0.00%
2	AeroClean	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	15	2,236.00	0.00	0.00%	1,103.50	49.35%	0.00	0.00%
3	Allied Fire Protection, Inc.	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	9	1,354.00	0.00	0.00%	256.00	18.91%	0.00	0.00%
4	American Environmental, Inc.	14	1,185.00	112.00	9.45%	1,185.00	100.00%	0.00	0.00%	190	30,318.75	1,822.00	6.01%	27,138.25	89.51%	288.50	0.95%
5	AmQuip Crane Rental LLC	2	245.00	0.00	0.00%	122.50	50.00%	0.00	0.00%	9	2,226.50	0.00	0.00%	1,089.00	48.91%	0.00	0.00%
6	Ayotte & King For Tile, Inc	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	24	450.50	0.00	0.00%	4.00	0.89%	0.00	0.00%
7	Bay Crane Northeast	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	1	10.00	0.00	0.00%	0.00	0.00%	0.00	0.00%
8	Bay State Elevator Co.	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	8	315.00	0.00	0.00%	0.00	0.00%	0.00	0.00%
9	BECO Electrical Contractors, Inc.	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	11	3,433.50	0.00	0.00%	1,116.50	32.52%	2,088.00	60.81%
10	Berkshire Concrete Cutting	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	3	24.50	0.00	0.00%	0.00	0.00%	7.50	30.61%
11	Berlin Steel Construction Company	47	5,382.00	297.50	5.53%	737.50	13.70%	160.00	2.97%	81	32,381.50	2,786.00	8.60%	4,812.00	14.86%	2,799.50	8.63%
12	BG Mechanical Contractors, Inc.	6	402.00	0.00	0.00%	0.00	0.00%	99.00	24.63%	6	554.00	0.00	0.00%	0.00	0.00%	235.00	42.42%
13	Blakeslee Prestress, Inc.	19	2,049.00	217.50	10.61%	322.00	15.71%	217.50	10.61%	40	18,304.00	1,725.00	9.42%	2,255.50	12.32%	1,518.50	8.30%
14	Chabot & Burnett Construction Co., Inc.	36	2,089.00	157.00	7.52%	364.00	17.42%	110.00	5.27%	59	6,506.50	388.00	5.96%	1,287.00	19.78%	623.00	9.58%
15	Champlain Masonry, Inc.	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	36	5,090.75	100.00	1.96%	1,492.00	29.31%	688.00	13.51%
16	Chandler Architectural Products	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	13	455.50	0.00	0.00%	53.00	11.64%	64.00	14.05%
17	CIP Concrete, Inc.	9	541.00	0.00	0.00%	104.00	19.22%	0.00	0.00%	12	2,544.00	0.00	0.00%	469.00	18.44%	0.00	0.00%
18	CK Flooring Solutions, Inc.	9	652.50	207.00	31.72%	207.00	31.72%	111.00	17.01%	17	961.50	223.00	23.19%	207.00	21.53%	111.00	11.54%
19	Coghlin Electrical Contractors, Inc.	27	1,899.00	224.00	11.80%	253.00	13.32%	261.00	13.74%	33	8,629.00	756.00	8.76%	856.00	9.92%	1,088.00	12.61%
20	Collins Electrical	21	1,942.00	175.00	9.01%	377.00	19.41%	117.00	6.02%	52	16,327.00	2,389.50	14.64%	2,014.00	12.34%	2,441.50	14.95%
21	Commonwealth Guardrail, Inc.	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	17	690.00	4.00	0.58%	69.00	10.00%	0.00	0.00%
22	Connecticut Drywall Finishing, Inc.	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	20	1,335.50	0.00	0.00%	158.50	11.87%	0.00	0.00%
23	Conte Company, LLC	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	3	24.00	0.00	0.00%	0.00	0.00%	8.00	33.33%
24	EDM Construction, Inc.	7	312.00	0.00	0.00%	78.00	25.00%	81.00	25.96%	14	899.50	82.50	9.17%	208.50	23.18%	247.50	27.52%
25	EF Corcoran Plumbing & Heating, Inc.	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	1	16.00	16.00	100.00%	0.00	0.00%	0.00	0.00%
26	Evermore Light and Power, Inc.	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	4	613.50	0.00	0.00%	0.00	0.00%	0.00	0.00%
27	Federal Concrete, Inc.	9	207.00	0.00	0.00%	12.00	5.80%	16.00	7.73%	68	19,281.00	1,464.50	7.60%	3,388.00	17.57%	1,609.50	8.35%
28	Folan Waterproofing & Construction	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	9	1,263.00	0.00	0.00%	534.50	42.32%	0.00	0.00%
29	Fontaine Bros, Inc.	10	718.00	144.00	20.06%	144.00	20.06%	147.00	20.47%	53	6,697.00	712.00	10.63%	2,160.00	32.25%	147.00	2.20%
30	Food Equipment Installation, Inc.	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	4	116.00	0.00	0.00%	0.00	0.00%	0.00	0.00%
31	Frisoli Electric Inc.	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	1	299.00	0.00	0.00%	0.00	0.00%	0.00	0.00%
32	Fusion Electric, Inc.	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	2	112.00	0.00	0.00%	104.00	92.86%	0.00	0.00%
33	Gagliarducci Construction, Inc.	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	47	4,262.50	635.00	14.90%	709.50	16.65%	906.50	21.27%
34	Gomes Construction Company, Inc.	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	4	575.50	0.00	0.00%	0.00	0.00%	0.00	0.00%
35	Green Insulation, Inc.	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	4	230.00	0.00	0.00%	16.00	6.96%	0.00	0.00%
36	H. Carr & Sons, Inc.	9	562.00	0.00	0.00%	360.00	64.06%	0.00	0.00%	9	902.00	0.00	0.00%	574.00	63.64%	0.00	0.00%
37	Harry Grodsky & Co.	6	240.00	0.00	0.00%	72.00	30.00%	0.00	0.00%	44	12,316.00	767.50	6.23%	1,346.50	10.93%	0.00	0.00%
38	Hayward Baker Inc.	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	36	4,465.50	306.50	6.86%	1,170.50	26.21%	775.00	17.36%
39	Heritage Restoration, Inc.	6	420.00	0.00	0.00%	192.00	45.71%	0.00	0.00%	13	2,345.00	82.00	3.50%	866.00	36.93%	0.00	0.00%
40	Hickman & Sgroi Electric Inc.	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	2	192.00	0.00	0.00%	0.00	0.00%	0.00	0.00%
41	Cyn Environmental Services	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	1	24.00	0.00	0.00%	24.00	100.00%	0.00	0.00%
42	JDC Demolition	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	23	3,504.00	400.00	11.42%	734.00	20.95%	160.00	4.57%
43	Jones Engineering LLC	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	2	168.00	0.00	0.00%	0.00	0.00%	0.00	0.00%
44	JRL Construction, Inc.	22	1,341.00	378.50	28.23%	416.50	31.06%	351.50	26.21%	78	26,075.56	4,259.21	16.33%	9,508.50	36.47%	5,322.00	20.41%
45	L.K. Sheet Metal, Inc.	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	9	2,925.50	294.00	10.05%	0.00	0.00%	0.00	0.00%
46	Langan Insulation LLC	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	2	568.00	0.00	0.00%	0.00	0.00%	0.00	0.00%
47	M.L. Schmitt, Inc.	5	613.00	139.00	22.68%	104.00	16.97%	142.00	23.16%	12	2,327.25	205.00	8.81%	344.75	14.81%	408.50	17.55%
48	Marr Scaffold	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	18	551.00	0.00	0.00%	253.00	45.92%	16.50	2.99%
49	Marguerite Concrete	9	85.50	0.00	0.00%	9.00	10.53%	9.00	10.53%	34	1,237.00	0.00	0.00%	86.00	6.95%	63.00	5.09%
50	Medeiros Hydroseeding & Landscape Construction, Inc.	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	2	17.00	0.00	0.00%	11.00	64.71%	0.00	0.00%
51	Moran Sheet Metal, Inc.	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	10	330.25	0.00	0.00%	64.25	19.45%	0.00	0.00%
52	NER Construction Management	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	10	893.00	0.00	0.00%	245.00	27.44%	0.00	0.00%
53	New England Foundation Co., Inc.	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	20	2,727.00	0.00	0.00%	587.50	21.54%	226.00	8.29%
54	Northeast Lighting Protection, LLC	2	20.12	0.00	0.00%	0.00	0.00%	0.00	0.00%	4	186.59	0.00	0.00%	61.76	33.10%	0.00	0.00%
55	Northeast Steel Erectors	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	7	1,335.00	34.00	2.55%	183.00	13.71%	393.00	29.44%
56	Northeastern Steel Corporation	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	6	64.00	9.00	14.06%	50.00	78.13%	0.00	0.00%
57	Northern General	9	271.00	24.00	8.86%	87.00	32.10%	24.00	8.86%	72	25,153.00	1,514.50	6.02%	4,353.00	17.31%	1,071.00	4.26%
58	P. Gioioso & Sons Inc.	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	9	834.50	114.50	13.72%	0.00	0.00%	0.00	0.00%
59	Palmer Paving Corporation	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	50	708.00	34.50	4.87%	14.00	1.98%	0.00	0.00%
60	Performance Testing & Balancing, LLC	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	3	64.00	0.00	0.00%	0.00	0.00%	38.00	59.38%
61	Professional Drywall Construction Inc.	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	64	3,793.50	196.50	5.18%	776.50	20.47%	347.00	9.15%

**MGM Springfield**  
**Workforce Diversity Report (By Company)**  
As of: March 30, 2017

Reference	Company	This Month's Workforce Diversity Statistics								Project To Date Workforce Diversity Statistics							
		Employee Count	This Month's Total Hours	Women		Minority		Veteran		Employee Count	Project To Date Total Hours	Women		Minority		Veteran	
				Hours	%	Hours	%	Hours	%			Hours	%	Hours	%	Hours	%
62	Regis Steel Corp	7	280.00	35.00	12.50%	3.00	1.07%	0.00	0.00%	56	7,977.00	1,190.50	14.92%	2,042.00	25.60%	289.00	3.62%
63	RoadSafe Traffic Systems	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	6	49.00	0.00	0.00%	0.00	0.00%	0.00	0.00%
64	S & F Concrete Contractors, Inc.	98	4,617.00	521.00	11.28%	1,725.50	37.37%	565.50	12.25%	260	45,704.00	2,816.00	6.16%	13,119.50	28.71%	4,319.50	9.45%
65	Safespan	2	70.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	11	709.50	0.00	0.00%	56.00	7.89%	0.00	0.00%
66	Safeway Services	17	1,094.08	80.00	7.31%	656.00	59.96%	88.00	8.04%	54	4,495.08	330.00	7.34%	2,843.00	63.25%	459.00	10.21%
67	Save-On-Wall Co., Inc.	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	9	290.50	45.00	15.49%	45.00	15.49%	8.00	2.75%
68	Security Construction Services, Inc. d/b/a: Security Fence Co.	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	14	3,866.00	300.00	7.76%	1,233.25	31.90%	40.00	1.03%
69	Soep Painting Corp	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	10	1,475.50	0.00	0.00%	6.00	0.41%	0.00	0.00%
70	Stamford Wrecking	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	9	1,669.00	76.00	4.55%	122.00	7.31%	74.00	4.43%
71	Superior Caulking & Waterproofing Co., Inc.	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	7	193.00	0.00	0.00%	155.50	80.57%	0.00	0.00%
72	T & M Equipment Corporation	9	532.00	144.00	27.07%	80.00	15.04%	48.00	9.02%	65	25,755.05	2,365.50	9.18%	4,995.05	19.39%	1,056.50	4.10%
73	Tech Valley Contracting, LLC	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	8	2,018.00	206.00	10.21%	0.00	0.00%	0.00	0.00%
74	Tishman	6	720.00	120.00	16.67%	120.00	16.67%	120.00	16.67%	19	17,461.00	2,901.00	16.61%	3,600.00	20.62%	5,520.00	31.61%
75	Titan Roofing Company	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	47	1,891.50	0.00	0.00%	201.00	10.63%	148.00	7.82%
76	T.J. Conway Company	15	1,429.50	128.00	8.95%	253.00	17.70%	152.00	10.63%	47	11,344.50	795.50	7.01%	1,750.00	15.43%	825.00	7.27%
77	Triton Leasing and Rental, Inc.	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	35	3,187.50	0.00	0.00%	1,547.50	48.55%	239.00	7.50%
78	Ultimate Abatement Company, Inc.	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	48	10,430.50	3,632.50	34.83%	10,119.50	97.02%	0.00	0.00%
79	Universal Electric Co.	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	18	5,635.00	556.50	9.88%	1,284.50	22.80%	394.00	6.99%
80	William Roberts Electric Co., Inc.	2	64.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	6	648.50	0.00	0.00%	93.00	14.34%	0.00	0.00%
81	Willow Tree Outdoor, LLC	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	5	261.50	0.00	0.00%	105.50	40.34%	0.00	0.00%
82	Wolfe House Movers, LLC	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	10	1,194.50	0.00	0.00%	306.00	25.62%	228.00	19.09%
83	Wolverine Fire Protection Co	8	704.00	0.00	0.00%	208.00	29.55%	112.00	15.91%	10	1,878.00	0.00	0.00%	699.00	37.22%	192.00	10.22%
84	Worcester Elevator Co., Inc.	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	2	12.00	0.00	0.00%	0.00	0.00%	6.00	50.00%
<b>Total - Unions</b>		<b>448</b>	<b>30,686.70</b>	<b>3,103.50</b>	<b>10.11%</b>	<b>8,192.00</b>	<b>26.70%</b>	<b>2,931.50</b>	<b>9.55%</b>	<b>2,179</b>	<b>411,970.28</b>	<b>36,535.21</b>	<b>8.87%</b>	<b>117,901.81</b>	<b>28.62%</b>	<b>37,489.00</b>	<b>9.10%</b>
85	On-Site Design / Management	72	6,206.70	732.20	11.80%	1,162.70	18.73%	580.25	9.35%	284	145,124.15	20,669.75	14.24%	16,166.10	11.14%	20,303.55	13.99%
<b>Total</b>		<b>520</b>	<b>36,893.40</b>	<b>3,835.70</b>	<b>10.40%</b>	<b>9,354.70</b>	<b>25.36%</b>	<b>3,511.75</b>	<b>9.52%</b>	<b>2,463</b>	<b>557,094.43</b>	<b>57,204.96</b>	<b>10.27%</b>	<b>134,067.91</b>	<b>24.07%</b>	<b>57,792.55</b>	<b>10.37%</b>

Totals - Overall			
Group	Project Goals	Project To Date	Delta
Women	6.90%	10.27%	3.37%
Minority	15.30%	24.07%	8.77%
Veteran	8.00%	10.37%	2.37%

- Notes:**  
(1) Statistics include all workforce reports that were received by MGM as of March 30, 2017.  
(2) The total number of unique union workers that have worked on site is approximately 2,036. The 2,179 union workers identified above includes workers that have worked for multiple companies.



MGM Springfield  
 Workforce Diversity Report (By Union)  
 As of: March 30, 2017

Reference	Union	This Month's Workforce Diversity Statistics								Project To Date Workforce Diversity Statistics							
		Employee Count	This Month's Total Hours	Women		Minority		Veteran		Employee Count	Project To Date Total Hours	Women		Minority		Veteran	
				Hours	%	Hours	%	Hours	%			Hours	%	Hours	%	Hours	%
1	AFSCME Local #230	0	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	1	48.00	0.00	0.00%	48.00	100.00%	0.00	0.00%
2	Asbestos Workers #6	0	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	30	3,094.50	0.00	0.00%	1,499.50	48.46%	239.00	7.72%
3	Boston Plasters' & Cement Masons' - Asphalt Layers' Union #534	19	425.50	0.00	0.00%	98.50	23.15%	0.00	0.00%	71	3,102.00	0.00	0.00%	452.00	14.57%	38.50	1.24%
4	Bricklayers Local #1	0	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	7	572.00	0.00	0.00%	11.00	1.92%	0.00	0.00%
5	Bricklayers Local #3	32	1,963.50	53.00	2.70%	270.50	13.78%	96.00	4.89%	125	16,987.50	357.00	2.10%	3,337.00	19.64%	875.50	5.15%
6	Carpenters - Local #108	48	3,215.58	631.50	19.64%	1,472.50	45.79%	450.00	13.99%	268	53,242.18	5,297.50	9.95%	15,482.00	29.08%	8,561.00	16.08%
7	Carpenters Local #107	2	200.00	0.00	0.00%	80.00	40.00%	0.00	0.00%	9	2,664.00	0.00	0.00%	304.00	11.41%	0.00	0.00%
8	Carpenters Local #210	0	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	2	16.00	0.00	0.00%	0.00	0.00%	8.00	50.00%
9	Carpenters Local #33	0	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	7	264.00	45.00	17.05%	0.00	0.00%	0.00	0.00%
10	Carpenters Local #424	0	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	2	72.00	0.00	0.00%	72.00	100.00%	65.00	90.28%
11	Carpenters Local #475	0	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	1	39.00	0.00	0.00%	0.00	0.00%	0.00	0.00%
12	Carpenters Local #535	1	72.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	1	104.00	0.00	0.00%	0.00	0.00%	0.00	0.00%
13	CT Bricklayers #1	0	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	2	41.50	0.00	0.00%	24.00	57.83%	0.00	0.00%
14	Floorcoverers Local #2168	8	603.50	207.00	34.30%	207.00	34.30%	111.00	18.39%	23	970.00	207.00	21.34%	211.00	21.75%	111.00	11.44%
15	International Association of Iron Workers Local #7	39	4,590.50	286.50	6.24%	472.00	10.28%	160.00	3.49%	85	29,533.00	1,977.00	6.69%	4,162.50	14.09%	2,465.00	8.35%
16	International Brotherhood of Electrical Workers - IBEW Local #455	0	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	3	112.25	50.75	45.21%	112.25	100.00%	0.00	0.00%
17	International Brotherhood of Electrical Workers - IBEW Local #7	55	4,518.00	538.00	11.91%	734.00	16.25%	520.00	11.51%	143	38,257.75	3,907.00	10.21%	5,844.75	15.28%	6,420.00	16.78%
18	International Brotherhood of Electrical Workers - IBEW Local #35	2	20.12	0.00	0.00%	0.00	0.00%	0.00	0.00%	4	186.59	0.00	0.00%	61.76	33.10%	0.00	0.00%
19	International Brotherhood of Electrical Workers - IBEW 2nd District	0	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	1	23.00	0.00	0.00%	0.00	0.00%	0.00	0.00%
20	International Union of Elevator Constructors Local #4	0	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	1	8.00	0.00	0.00%	0.00	0.00%	0.00	0.00%
21	International Union of Elevator Constructors Local #41	0	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	10	327.00	0.00	0.00%	0.00	0.00%	6.00	1.83%
22	International Union of Operating Engineers - IUOE Local #4	7	90.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	60	6,393.00	0.00	0.00%	241.50	3.78%	807.00	12.62%
23	International Union of Operating Engineers - IUOE Local #5	0	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	1	9.00	0.00	0.00%	0.00	0.00%	0.00	0.00%
24	International Union of Operating Engineers - IUOE Local #98	17	1,536.50	75.00	4.88%	435.00	28.31%	48.00	3.12%	160	34,095.05	1,409.00	4.13%	4,900.55	14.37%	2,087.00	6.12%
25	International Union of Operating Engineers - IUOE Local #478	0	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	2	168.00	0.00	0.00%	0.00	0.00%	0.00	0.00%
26	International Union of Painters and Allied Trades - IUPAT District #11	0	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	6	125.50	0.00	0.00%	0.00	0.00%	0.00	0.00%
27	International Union of Painters and Allied Trades - IUPAT Local #1333	0	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	9	306.50	0.00	0.00%	29.00	9.46%	64.00	20.88%
28	Iron Workers District Council of New England	29	1,983.00	252.50	12.73%	415.00	20.93%	298.50	15.05%	117	23,375.00	3,102.00	13.27%	5,498.00	23.52%	2,045.00	8.75%
29	Laborers' District Council	0	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	21	2,451.00	0.00	0.00%	1,013.00	41.33%	15.00	0.61%
30	Laborer's International Union of North America - LIUNA Building Wreckers Local #1421	4	348.00	0.00	0.00%	348.00	100.00%	0.00	0.00%	184	28,270.75	3,869.25	13.69%	26,758.75	94.65%	0.00	0.00%
31	Laborers Local #138	1	8.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	2	89.00	0.00	0.00%	0.00	0.00%	0.00	0.00%
32	Laborers Local #151	1	8.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	3	150.00	0.00	0.00%	0.00	0.00%	0.00	0.00%
33	Laborers Local #22	3	59.00	0.00	0.00%	0.00	0.00%	16.00	27.12%	18	6,005.50	0.00	0.00%	454.00	7.56%	980.50	16.33%
34	Laborers Local #223	0	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	3	148.00	0.00	0.00%	54.00	36.49%	0.00	0.00%
35	Laborers Local #230	1	112.00	0.00	0.00%	112.00	100.00%	0.00	0.00%	8	691.25	0.00	0.00%	666.75	96.46%	7.50	1.08%
36	Laborers Local #243	1	68.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	3	3,429.50	0.00	0.00%	0.00	0.00%	0.00	0.00%
37	Laborers Local #39	1	24.00	0.00	0.00%	0.00	0.00%	24.00	100.00%	3	1,002.50	0.00	0.00%	0.00	0.00%	833.00	83.09%
38	Laborers Local #455	2	184.00	112.00	60.87%	184.00	100.00%	0.00	0.00%	16	4,732.00	1,335.50	28.22%	4,732.00	100.00%	0.00	0.00%
39	Laborers Local #473	0	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	9	1,166.00	0.00	0.00%	2.00	0.17%	0.00	0.00%
40	Laborers Local #547	0	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	3	686.50	0.00	0.00%	0.00	0.00%	0.00	0.00%
41	Laborers Local #560	0	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	1	8.00	0.00	0.00%	0.00	0.00%	0.00	0.00%
42	Laborers Local #596	36	1,876.50	128.00	6.82%	597.50	31.84%	14.00	0.75%	133	24,811.75	2,219.00	8.94%	7,209.00	29.05%	465.50	1.88%
43	Laborers Local #609	2	21.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	10	336.50	0.00	0.00%	32.00	9.51%	0.00	0.00%
44	Laborers Local #610	0	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	1	4.00	0.00	0.00%	0.00	0.00%	0.00	0.00%
45	Laborers Local #611	0	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	1	270.50	0.00	0.00%	270.50	100.00%	0.00	0.00%
46	Laborers Local #665	0	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	9	1,659.50	32.00	1.93%	1,659.50	100.00%	0.00	0.00%
47	Laborers Local #675	0	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	1	133.50	0.00	0.00%	133.50	100.00%	0.00	0.00%
48	Laborers Local #88 [Tunnel Workers]	0	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	4	338.50	0.00	0.00%	8.00	2.36%	41.00	12.11%
49	Laborers Local #999	97	5,676.00	684.00	12.05%	2,064.00	36.36%	822.00	14.48%	387	80,729.96	10,731.71	13.29%	27,095.25	33.56%	9,817.00	12.16%
50	Laborers Local #1000	3	24.00	8.00	33.33%	8.00	33.33%	0.00	0.00%	3	24.00	8.00	33.33%	8.00	33.33%	0.00	0.00%
51	Massachusetts Laborers' District Council	0	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	6	400.00	0.00	0.00%	85.00	21.25%	0.00	0.00%
52	NY Bricklayers #2	0	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	1	4.00	0.00	0.00%	0.00	0.00%	0.00	0.00%
53	Operating Engineers Local #4	1	92.50	0.00	0.00%	0.00	0.00%	0.00	0.00%	14	845.50	0.00	0.00%	0.00	0.00%	0.00	0.00%
54	Operating Engineers Local #478	0	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	4	329.50	0.00	0.00%	139.50	42.34%	0.00	0.00%
55	Painters and Allied Trades District Council #35	0	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	24	2,717.50	0.00	0.00%	164.50	6.05%	0.00	0.00%
56	Pile Drivers Local #56	0	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	19	2,114.00	0.00	0.00%	468.50	22.16%	180.50	8.54%
57	Plasterers and Cement Masons Local #534	6	192.00	0.00	0.00%	161.00	83.85%	9.00	4.69%	23	667.00	0.00	0.00%	319.50	47.90%	41.00	6.15%
58	Plumbers & Pipefitters #104	27	2,071.50	128.00	6.18%	325.00	15.69%	251.00	12.12%	98	24,230.50	1,579.00	6.52%	3,096.50	12.78%	1,060.00	4.37%
59	Roofers #248	0	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	38	1,677.00	0.00	0.00%	206.00	12.28%	26.00	1.55%
60	Sheet Metal Workers #17	0	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	4	116.00	0.00	0.00%	0.00	0.00%	0.00	0.00%
61	Sheet Metal Workers #40	0	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	2	436.00	0.00	0.00%	0.00	0.00%	0.00	0.00%
62	Sheet Metal Workers #63	0	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	28	2,981.25	294.00	9.86%	64.25	2.16%	38.00	1.27%
63	Sprinkler Fitters #669	8	704.00	0.00	0.00%	208.00	29.55%	112.00	15.91%	19	3,232.00	0.00	0.00%	955.00	29.55%	192.00	5.94%
64	Teamsters #404	0	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	7	945.50	114.50	12.11%	16.00	1.69%	0.00	0.00%
<b>Subtotal - Other Unions</b>		<b>453</b>	<b>30,686.70</b>	<b>3,103.50</b>	<b>10.11%</b>	<b>8,192.00</b>	<b>26.70%</b>	<b>2,931.50</b>	<b>9.55%</b>	<b>2,261</b>	<b>411,970.28</b>	<b>36,535.21</b>	<b>8.87%</b>	<b>117,901.81</b>	<b>28.62%</b>	<b>37,489.00</b>	<b>9.10%</b>
65	On-Site Design / Management	72	6,206.70	732.20	11.80%	1,162.70	18.73%	580.25	9.35%	284	145,124.15	20,669.75	14.24%	16,166.10	11.14%	20,303.55	13.99%
<b>Total</b>		<b>525</b>	<b>36,893.40</b>	<b>3,835.70</b>	<b>10.40%</b>	<b>9,354.70</b>	<b>25.36%</b>	<b>3,511.75</b>	<b>9.52%</b>	<b>2,545</b>	<b>557,094.43</b>	<b>57,204.96</b>	<b>10.27%</b>	<b>134,067.91</b>	<b>24.07%</b>	<b>57,792.55</b>	<b>10.37%</b>

Totals - Overall			
Group	Project Goals	Project To Date	Delta
Women	6.90%	1	

APPENDIX D

LETTER REGARDING COST OF CONSTRUCTION AND CAPITALIZATION OF GAMING LICENSE





May 22, 2017

Massachusetts Gaming Commission  
101 Federal Street, 12<sup>th</sup> Floor  
Boston, MA 02110

**Re: Quarterly Report – First Quarter 2017**

Dear Commissioners:

In accordance with 205 CMR.135.02(5)(a) of the Massachusetts Gaming Commission Monitoring of Project Construction and Licensee Requirements (the "Monitoring Regulations"), please see on the attached Exhibit A the costs of construction, infrastructure improvements and related costs incurred by Blue Tarp reDevelopment, LLC ("MGM") through March 31, 2017 in connection with the development of MGM Springfield project in Springfield, Massachusetts (the "Project") compared to MGM's cost estimates as of that date, which costs have been calculated in accordance with 205 CMR 122.03: Costs Included in the Calculation of Capital Investment.

In addition, in accordance with 205 CMR 135.02(b) of the Monitoring Regulations, I direct you to the publicly-filed financial statements of MGM Resorts International, the parent company of Blue Tarp reDevelopment, LLC (the "Licensee"), including MGM's Quarterly Report on Form 10-Q for the quarterly period ended March 31, 2017, filed with Securities and Exchange Commission (the "SEC") on May 9, 2017, which is available at [www.sec.gov](http://www.sec.gov). As reflected in these financial statements, the Licensee has sufficient resources in order to meet all expected financial obligations relating to the completion of the gaming establishment and related infrastructure improvements associated with the Project.

I hereby certify that the foregoing and attached information is truthful and accurate to the best of my knowledge and belief.

Sincerely,

Courtney Wenleder  
Vice President & CFO

cc: Michael Mathis, President & COO  
Seth N. Stratton, Vice President & Legal Counsel  
Edward Pikula, Esq., Springfield City Solicitor

---

MGM Springfield  
One Monarch Place - Suite 910  
Springfield, MA 01144  
413-273-5000

# **EXHIBIT A**



# Q1 2017 COST ESTIMATE (\$mm)

Ref	Description	Incurred To Date	Remaining	Total Estimate
1	Construction / Design	\$183.6	\$313.2	\$496.8
2	FF&E	\$0.1	\$74.9	\$75.0
3	OSE	\$0	\$43.7	\$43.7
	<b>Subtotal of Eligible Cap. Costs</b>	<b>\$183.7</b>	<b>\$431.8</b>	<b>\$615.5</b>
4	Land	\$49.5	\$1.8	\$51.3
5	Off-site Parcel Improvements	\$11.3	\$0	\$11.3
6	License/ Application Fees	\$85.0	\$0	\$85.0
7	Pre-opening Exp. / Host Comm. Costs	\$47.7	\$74.8	\$122.5
8	Fin. Costs / Capitalized Int.	\$18.0	\$50.5	\$68.5
9	Project Contingency	\$0	\$35.0 - \$41.8	\$35.0 - \$41.8
	<b>Subtotal of Ineligible Costs</b>	<b>\$211.5</b>	<b>\$162.1 – \$168.9</b>	<b>\$373.6 - \$380.4</b>
	<b>Total</b>	<b>\$395.2</b>	<b>\$593.9 - \$600.7</b>	<b>\$989.1 - \$995.9</b>

Notes:

(1) Total estimate before Contingency is \$954.1mm. If spent, Contingency is more likely to be spent on and reclassified as Eligible Capital Costs.

(2) The figures above are approximations to the nearest hundred thousand, which in some instances results in minor discrepancies (\$100k or less) in sums.

APPENDIX E

CONSTRUCTION SITE PROGRESS IMAGES AS OF MARCH 31, 2017



# OVERALL SITE PROGRESS



Overall Site Activity from Armory - December 13, 2016



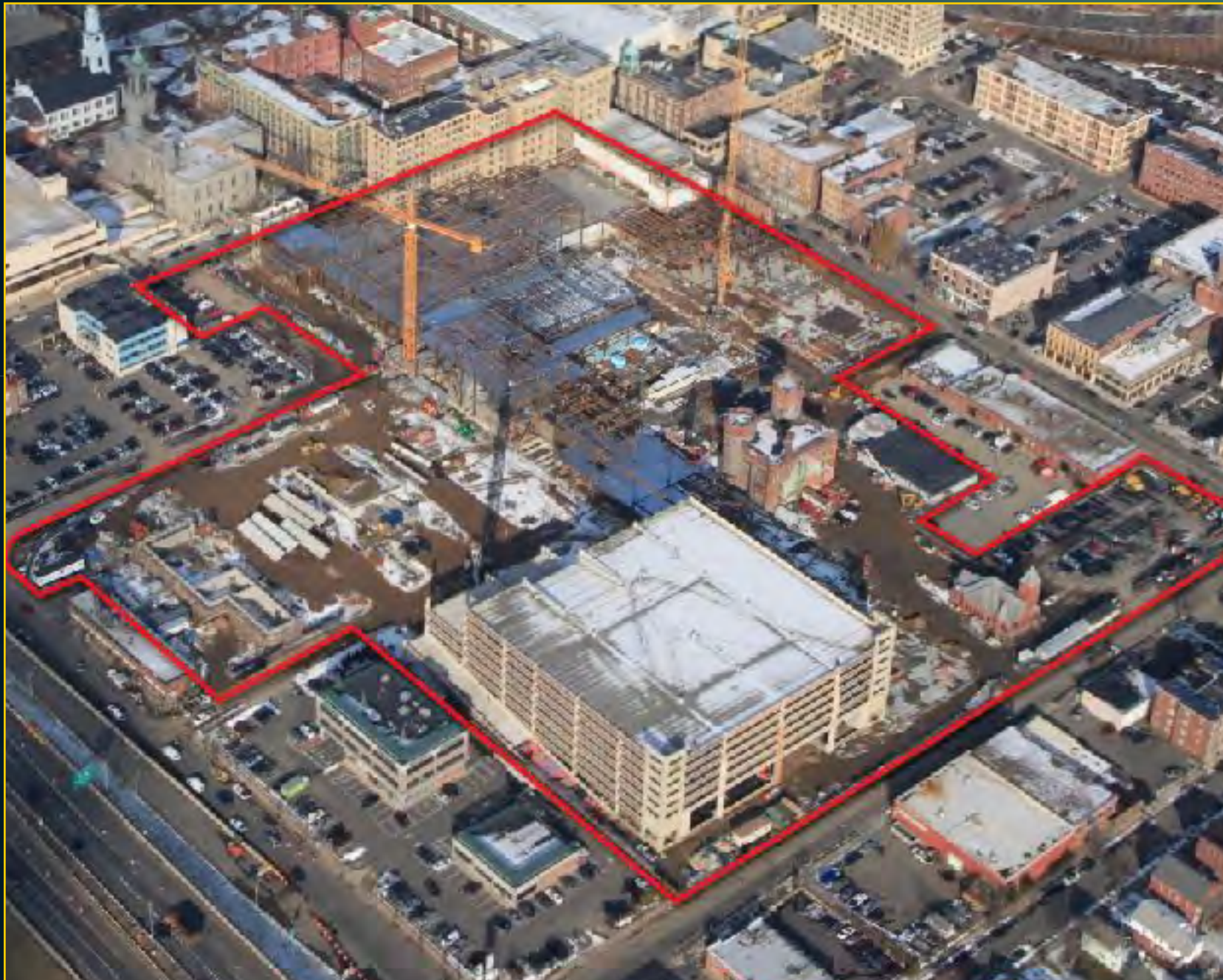
# OVERALL SITE PROGRESS



Overall Site Activity from Armory - March 13, 2017



# AERIAL PROGRESS



Aerial View - December 14, 2016



Aerial View - March 13, 2017



# PODIUM CONSTRUCTION PROGRESS



73 State Construction - January 26, 2017



Podium Enclosure - March 8, 2017



Podium Construction - March 8, 2017



# PODIUM CONSTRUCTION PROGRESS



Podium Enclosure - March 21, 2017



Clean Up - March 15, 2017



Podium Steel - March 28, 2017



# HOTEL CONSTRUCTION PROGRESS



Main Street Scaffolding - January 19, 2017



Hotel Construction - February 8, 2017



Hotel Construction - February 7, 2017



# HOTEL CONSTRUCTION PROGRESS



Hotel Entrance - January 25, 2017



Hotel Entrance - February 24, 2017



Hotel Entrance - March 8, 2017



Hotel Entrance - March 29, 2017



# ENTERTAINMENT CONSTRUCTION PROGRESS



Entertainment Steel Erection - January 26, 2017



Entertainment Steel Erection - February 6, 2017



# GARAGE CONSTRUCTION PROGRESS



Garage Construction - February 6, 2017



Garage Construction - March 8, 2017



Garage Construction - March 3, 2017



# GARAGE CONSTRUCTION PROGRESS



Garage Construction - March 8, 2017



Garage Construction - March 28, 2017



# TOPPING OFF CEREMONY



Topping Off Ceremony - March 29, 2017



Beam Signatures - March 29, 2017



# TOPPING OFF CEREMONY



Topping Off Ceremony - March 29, 2017



Beam Signatures - March 29, 2017



Topping Off Ceremony - March 29, 2017





Frank P. Fitzgerald  
John E. Drost, Jr.  
Stephanie A. Fitzgerald †  
Brian S. Fitzgerald \*  
Jane L. Mantolesky  
Daniel T. Wright \*  
Nicholas D. Amanti # ≈

† Also admitted in New York  
\* Also admitted in Connecticut  
# Also admitted in New Jersey  
≈ Also Admitted in Pennsylvania

Direct e-mail: [fpf@fitzgeraldatlaw.com](mailto:fpf@fitzgeraldatlaw.com)

May 17, 2017

*Via E-mail to [pdromey@springfieldcityhall.com](mailto:pdromey@springfieldcityhall.com)*

Phil Dromey  
City of Springfield Office of Planning and Economic Development  
70 Tapley Street  
Springfield, MA 01104

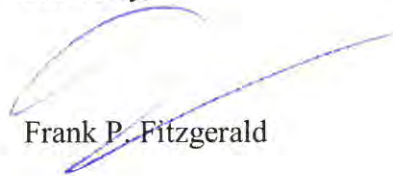
**RE: *Signage and Specialty Lighting Concept Traffic Study***

Dear Phil,

As you are aware, this office represents Blue Tarp reDevelopment, LLC/MGM Springfield (“MGM”) in connection with its resort casino project located in downtown Springfield (the “Project”). Pursuant to Section II(D)(5) of the Site Plan Review Supplemental Findings and Decision of the City Council dated October 21, 2016 and Article 8, Section 8.5.75(C) of the City of Springfield Zoning Ordinance enclosed please find the traffic study in connection with the proposed signage for the Project.

Please contact me if you have any questions following your review of the documentation.

Sincerely,



Frank P. Fitzgerald

Enclosure

cc: Seth Stratton, Esq., via email  
Brian Packer, via email



To: Mr. Seth N. Stratton  
Vice President & General Counsel  
MGM Springfield

Date: May 3, 2017

Project #: 13895.00

## Memorandum

From: Vinod Kalikiri, P.E., PTOE  
Mike Tantillo  
Craig Schneider

Re: Digital Signage Review for MGM Springfield

### Summary

This technical memorandum summarizes VHB's review of the current Massachusetts legislation, best practices, and literature review in regards to electronic outdoor on-site advertising signs. The literature review conducted by VHB specifically focused on the effects of electronic outdoor advertising signs on traffic and distracted driving. The conclusions of this memorandum are solely derived from the current state of research for electronic outdoor advertising signs, on premise signage, distracted driving, and the relationship between such signing and vehicular crashes as presented in the literature review. It is noted that VHB has not performed an independent analytical data-based research on the subject.

**Overall, the available literature on the subject of digital signing and driver distraction indicates that, though different studies showed different possible effects on driver behavior, there is no statistically significant correlation between on-site outdoor electronic signs and driver safety or crashes.** A discussion of VHB's review follows.

### City of Springfield Zoning Code

Some of MGM Springfield's on-site outdoor advertising signs will be oriented towards highways, including East Columbus Avenue, Interstates 91 and 291. Many drivers on the highways are regular users likely to be familiar with the MGM Springfield project, while other drivers will learn of MGM's existence when driving past the site for the first time.

§ 8.5 of Springfield's zoning code acknowledges the unique signing needs of MGM Springfield and encourages the use of unique and creative signing concepts. § 8.5.74 addresses signs facing highways, including East Columbus Avenue, I-91, and I-291, and requires that signs be designed to avoid disruption to traffic flow and highway safety problems. In addition, reader boards, repeated text messages, and animated signing is only permitted on a temporary basis and for special events. The City of Springfield recognized that an effective balance between highway safety and on-site outdoor advertising is critical to the success of the MGM Springfield project, and has therefore required that the on-site signing be designed in a way that minimizes driver distraction and the diversion of attention away from the roadway, while providing a visually appealing and memorable experience for those highway users passing MGM Springfield. The provisions of the zoning code aim to allow outdoor advertising signs that can be used in a way that communicates important information about MGM Springfield and its special events while not needlessly drawing a driver's attention away from the critical driving task.

### Literature Review

The literature review focuses on the relationship between driver distraction caused by outdoor advertising signs and crashes. **As documented in this section, different studies showed different possible effects on driver behavior. However, no conclusive or statistically significant correlation between on-site outdoor electronic signs and driver safety or crashes was identified in the reports.**

Driver distraction, in general, is believed to be a contributory factor in many crashes (Klauer et al. 2006; National Highway Traffic Safety Administration 2009; Olson et al. 2009). Many previous studies have not been able to attribute increased crash rates to electronic outdoor advertising signs (McMonagle 1952; Tantala and Tantala 2007; Tantala and Tantala 2010; Wallace

101 Walnut Street  
PO Box 9151  
Watertown, MA 02472  
P 617.924.1770



2003; Smiley et al. 2005), while other studies, including Farbray et al. (2001) and Sisiopiku et al. (2014), found an increase in sideswipe and rear-end crashes. The exact correlation between distraction and electronic outdoor advertising signs may not be able to be determined through traditional crash or "post-hoc analyses" (i.e., deducing statistically significant trends after experimentation). Typical crash studies review police crash reports or statistical summaries of the crash reports to determine the cause of the crash that has taken place. As stated in Molino et al. (2009), crashes are infrequent events and data collection needs to span extended periods of time to obtain an extensive data set both before and after the introduction of a change in roadway conditions. Therefore, researchers need to collect comparable and substantial data sets in order to investigate this topic. Studies are likely to underreport crashes, especially minor crashes caused by inattention or driver distraction, as the driver may be unwilling or unable to report these factors (Molino et al 2009) if the crash is even reported to law enforcement at all.

Various studies (laboratory simulator research, naturalistic driving studies, eye tracking and drive behavior research) have been conducted in an attempt to determine a correlation between traffic safety and electronic outdoor advertising signs, including off-site billboards and on-site signs intended to be viewed by road users. While the results from some simulator studies have shown that the dynamic content, in addition to the placement of the sign with respect to its surroundings, have an influence on driver performance (for example, in the form of variability of lateral lane position or reduction in speed while passing electronic outdoor advertising signs [Chattington et al. 2009; Crundall et al. 2006; Hughes and Cole 1986]) or that road stretches with advertising signs had more lane deviations (Bendak and Al-Saleh 2010), other studies do not support these results. For example, Molino et al (2009) discovered using eye-tracking technology that the glances at outdoor advertising signs (in this study, billboards were examined) were not associated with long glances away from the roadway in a way that would present a safety risk, as the roadway ahead was still in view. In effect, the study found that the amount of time drivers spent glancing at outdoor advertising signs was similar to the amount of time spent glancing at other objects and signs along the roadway.

A driver simulation study by Edquist et al. (2011) showed that advertising signs affected visual scanning, causing increased reaction times to road signs and increased the number of driver errors. Eye-tracking studies have confirmed and elaborated on the attention-grabbing nature of electronic outdoor advertising signs (Beijer et al. 2004; Crundall et al. 2006; Simley et al. 2005; Young and Mahfoud 2007; Young et al. 2009). These electronic outdoor advertising signs influence gaze behavior because they attract more numerous and longer glances than standard road signs and conventional outdoor advertising signs (Dukic et al. 2013). In addition, Dukic et al. (2013) found no differences for the factors day/night (time of day), and no effect was found for the driving behavior data. None of these studies were able to conclusively link changes in visual scanning behavior to an increased risk of crashes.

A study conducted by Trick and Enns (2009) determined a framework, in which a glance at an advertising sign has different reasons. The driver may employ a routine scanning behavior to assess the traffic situation continuously. Noticing the sign, the driver may choose to have a closer look, while having a mental picture of how the traffic situation is likely to develop. Thus, the glance is planned and unlikely to result in a dangerous situation. Whether these signs attract too much attention and should be regarded as a potential traffic safety hazard cannot be answered conclusively as a driver may become distracted only if the driver's attention is absorbed by the billboard more than originally intended. The researchers recommended that additional controlled investigations be conducted to determine the specific effects the on-road environment has on gaze behavior, speed, lateral positioning, tactical maneuvering, and driver conflict. The concept of planned glances occurring when road conditions are amenable to such gazes from the driver may explain why shifts in driver behavior do not necessarily lead to a corresponding increase in crash activity.

During the literature review, it was also noted that the off-site billboard industry has voluntarily chosen to adopt practices that minimize driver distraction. For example, most off-site billboards display static images and retain the same image for at least eight (8) seconds (Namba 2012). This serves two purposes. First, the driver needs to only take a brief glance to be able to absorb the information, as opposed to a video message that would invite a lengthy look from a driver. Second, the

driver will eventually become accustomed to the message being displayed for eight seconds or more on electronic billboards and will understand that there is no need to attempt to read the billboard during a complex driving maneuver (e.g., a lane change) out of fear that the message will be “missed”. Instead, the driver can plan a glance based on the traffic conditions, knowing the message will be displayed for a reasonable amount of time.

## Similar On-Site Signage

Two examples of other on-site electronic advertising devices in Massachusetts are noted as part of this memorandum. The WGBH Headquarters complex in Boston contains a 30-foot LED digital façade. This digital sign is visible from I-90, the Massachusetts Turnpike, from over two miles away. In addition, the Naismith Basketball Hall of Fame in Springfield advertises with a tall LED-lit basketball visible from I-91 in the general vicinity of the MGM Springfield project. ***In neither case did the installation of or continued operation of these on-site advertising devices result in reported safety concerns or an increase in reported crash activity that is attributable to the digital signs.***

## Conclusions

Studies in general have shown a complex relationship between electronic outdoor advertising signs and driver distraction. Research has shown roadside advertising may attract the drivers’ eyes away from the roadway. Some studies have shown that drivers have been shown to be less observant of vehicles stopping in front of them as well as drift into adjacent lanes when in the presence of electronic outdoor advertising signs (Wachtel, 2011). However, the reports reviewed for the preparation of this memorandum did not provide a conclusive link to a reduction in traffic safety.

***In summary, the available literature on the subject of digital signing and driver distraction indicates that, though different studies showed different possible effects on driver behavior, there is no statistically significant correlation between on-site outdoor electronic signs and driver safety or crashes.***

## Sources

- Beijer D, Smiley A, Eizenman M. Observed driver glance behavior at roadside advertising signs. *Transp Res Rec.* 2004;1899:96–103.
- Bendak S, Al-Saleh K. The role of roadside advertising signs in distracting drivers. *Int J Ind Ergon.* 2010;40:233–236.
- Chattington M, Reed N, Basacik D, Flint A, Parkes A. Investigating Driver Distraction: The Effects of Video and Static Advertising.
- Crundall D, Van Loon E, Underwood G. Attraction and distraction of attention with roadside advertisements. *Accid Anal Prev.* 2006;38:671–677.
- Dukic T, Ahlstrom C, Björketun U, et al. Effects of Billboards on Traffic Safety—A Study on the Motorway E4 in Stockholm. Linköping, Sweden: Swedish Road and Transport Research Institute; 2011. No.725.
- Dukic T, Hanson L, Holmqvist K, Wartenberg C. Effect of button location on driver’s visual behaviour and safety perception. *Ergonomics.* 2005;48:399–410.
- Dukic, T; Ahlstrom, C.; Patten, C.; Kettwich, C.; Kircher, K. Effects of Electronic Billboards on Driver Distraction. *Traffic Injury Prevention.* 2013;14:469-476.
- Edquist J, Horberry T, Hosking S, Johnston I. Effects of advertising billboards on simulated driving. *Appl Ergon.* 2011;42:619–626.
- Farbray J, Wochinger K, Shafer T, Owens N, Nedzesky A. Research Review of Potential Safety Effects of Electronic Billboards on Driver Attention and Distraction. Washington, DC: Federal Highway Administration; 2001.
- Klauer SG, Dingus TA, Neale VL, Sudweeks J, Ramsey D. The Impact of Driver Inattention on Near-Crash/Crash Risk: An Analysis Using the 100-Car Naturalistic Driving Study Data. Washington, DC: National Highway Traffic Safety Administration; 2006. No. DOT HS 810 594.



- McMonagle A. Traffic accidents and roadside features. Highway Res Board Bull. 1952;55:38–48.
- Molino, J.A., Wachtel, J., Farby, J.E., Hermosillo, M.B., Granda, T.M. The Effects of Commercial Electronic Variable Message Signs (CEVMS) on Driver Attention and Distraction. Federal Highway Administration; 2009, No. HRT-09-018.
- Namba, Suzy. Effects of Outdoor Advertising Displays on Driver Safety. Caltrans Division of Research and Innovation; 2012.
- National Highway Traffic Safety Administration. Traffic Safety Facts—Research Note: An Examination of Driver Distraction as Recorded in NHTSA Databases. Washington, DC: NHTSA National Center for Statistics and Analysis; 2009. No. DOT HS 811 216.
- Olson R.L., Hanowski R.J., Hickman J.S., Bocanegra J. Driver Distraction in Commercial Vehicle Operations. Washington, DC: US Department of Transportation, Federal Motor Carrier Safety Administration; 2009. No. FMCSA-RRR-09-042.
- Sisiopiku, V., Islam M., Sullivan, A. Traffic Safety Risks from Digital Advertising Billboards in Alabama. International Journal of Engineering Research and Development, 2014;10:30-36.
- Smiley A, Persaud B, Bahar G, et al. Traffic safety evaluation of video advertising signs. Transp Res Rec. 2005;1937:105–112.
- Tantala AM, Tantala MW. A Study of the Relation Between Digital Billboards and Traffic Safety in Cuyahoga County, Ohio. Philadelphia, PA: Tantala Associates; 2007.
- Tantala AM, Tantala MW. A Study of the Relation Between Digital Billboards and Traffic Safety in Henrico County and Richmond, Virginia. Submitted to the Foundation for Outdoor Advertising Research and Education (FOARE): Tantala Associates; 2010.
- Transit. Can I put an advertising sign alongside a state highway? 2008. Available at: <http://www.nzta.govt.nz/resources/advertisingsign-alongside-sh/>. Accessed April 24, 2017.
- Trick LM, Enns JT. A two-dimensional framework for understanding the role of attention selection in driving. In: Castro C, ed. Human Factors of Visual and Cognitive Performance in Driving. Boca Raton, FL: CRC Press; 2009, pp. 63–72.
- Wachtel, B. Digital Billboards, Distracted Drivers. Planning. 2011;77:25-27.
- Wallace B. Driver distraction by advertising: genuine risk or urban myth? Munic Eng. 2003;156:185–190.
- Wallace B. External-To-Vehicle Driver Distraction. Development Department Research Programme. 2003;168:1-4.
- Young MS, Mahfoud JM. Driven to Distraction: Determining the effects of Roadside Advertising on Driver Attention. Uxbridge, England: Brunel University; 2007.
- Young MS, Mahfoud JM, Stanton NA, Salmon PM, Jenkins DP, Walker GH. Conflicts of interest: The implications of roadside advertising for driver attention. Transportation Research Part F: Traffic Psychology and Behaviour. 2009;12: 381–388.



TO: Commissioners  
FROM: John Ziemba, Ombudsman  
CC: Edward R. Bedrosian, Jr., Executive Director  
DATE: May 23, 2017  
RE: City of Medford - 2016 Community Mitigation Fund Amendment

---

The City of Medford was awarded \$67,000 in transportation mitigation funds in 2016 for a salaried transportation planner. The recommendation from the review team to the Commission at the time was to fund the prorated portion of one year's worth of a part-time or full-time transportation planner for costs incurred through fiscal year 2017. The review team also recommended that the Commission establish a condition that Medford must certify that 100% of the planner's activities would be casino related. Due to constraints in hiring and concerns regarding certifying that all time used by the transportation planner is casino related, the City of Medford has not yet utilized its planning grant. In order to remedy the certification concern, Medford and Commission staff determined that a contract employee could more readily allocate his or her time specifically to casino related concerns in order to ensure that any non-casino related work is not charged to the grant. Therefore, Commission staff recommends that the Commission authorize Medford to utilize its funding to hire a contract employee / consultant instead of a salaried municipal employee.

Medford anticipates the hiring of a contractor no earlier than June 2017. Given that such date is late in the fiscal year, we ask the Commission to authorize the use of the grant funds to extend into fiscal year 2018 and to authorize the use of grant funds for a contract employee / consultant. As noted, approval is necessary because the Commission specified that such assistance is for the transportation planner's salary, not a contract employee / consultant, and is for fiscal year 2017.



Massachusetts Gaming Commission



**Senate Committee on Ways and Means Fiscal Year 2018 Budget Recommendations**

**Race Horse Development Fund Transfer**

**SECTION 79.** Notwithstanding any general or special law to the contrary, the 1094 comptroller shall transfer \$15,000,000 from the unexpended balance of the Race Horse Development Fund established in section 60 of chapter 23K of the General Laws to the General Fund not later than June 30, 2018. Subject to appropriation, money transferred to the General Fund shall be expended to support programming and operations for the department of agricultural resources and the department of conservation and recreation.

.....

**FY 2018 Budget Senate Debate**

**Budget Amendment ID: FY2018-S3-42**

**OTH 42**

**Victims of Human Trafficking Trust Fund**

Messrs. Montigny and Cyr moved that the proposed new text be amended by inserting, after section \_\_, the following 4 sections:-

SECTION \_\_. Section 66A of chapter 10 of the General Laws, as appearing in the 2014 Official Edition, is hereby amended by striking the second sentence in its entirety and inserting in place thereof the following:-

The fund shall consist of monies received pursuant to section 55 of chapter 23K; proceeds of assets seized and forfeited pursuant to sections 55 and 56 of chapter 265; and fines and assessments collected pursuant to sections 50, 51, and 54 of said chapter 265, together with any interest or earnings accrued on such monies through investment or deposit.

SECTION \_\_. Chapter 10 of the General Laws, as so appearing, is hereby amended by inserting after section 66A the following new section:-

Section 66B. There shall be established and set up on the books of the commonwealth a separate fund to be known as the Human Trafficking Prevention Trust Fund. The fund shall consist of monies deposited from the Gaming Revenue Fund pursuant to section 59 of chapter 23K, together with any interest or earnings accrued on such monies through investment or deposit. The state treasurer shall be the custodian of the fund and shall receive, deposit and invest all monies transmitted to him under this section in accordance with sections 34 and 38 of chapter 29 in such a manner as to secure the highest rate of return available consistent with the safety of the fund, and shall credit interest and earnings on the trust fund corpus to the trust fund. The state treasurer shall transfer funds from the income and receipts of the fund to the executive office of public safety and security, from time to time, at the request of the commissioner of said office.

The commissioner shall award and administer grants from said fund, without further appropriation, for measures to prevent and combat human trafficking including, but not limited to: (i) training programs for law enforcement officers, trial court personnel, educators in kindergarten through grade 12, and health care professionals on methods and best practices to identify and respond to human trafficking; (ii) public awareness campaigns designed to educate the public on the prevalence and dangers of human trafficking in the commonwealth; (iii) data collection projects; and (iv) first offender sexual exploitation prevention programs certified by the commissioner of probation and made available by the trial court under its discretion.

The commissioner shall file a report detailing the amount of funds collected and expended from the fund, along with a copy of the written criteria used to expend the funds, to the house and senate committees on ways and means not later than August 15 of each calendar year. Administrative and operational expenses directly attributable to the grants and programs funded by the fund including, but not limited to, the costs of clerical and support personnel, shall not exceed 5 per cent of the total assets of the fund in any 1 fiscal year. Any unexpended balance of monies in the fund at the end of the fiscal year shall not revert to the General Fund but shall remain available for expenditure from such fund in



subsequent fiscal years. No expenditure from the fund shall cause the fund to become deficient at any point during the fiscal year.

SECTION \_\_. Section 55 of chapter 23K of the General Laws, as so appearing, is hereby amended by striking out, in line 6, the words “9 per cent” and inserting in place thereof the following:- “4.5 per cent”;

and further, by adding after the figure 60, in line 8, the following:-

and 4.5 per cent of its daily gross gaming revenue to the Victims of Human Trafficking Trust Fund established in section 66A of chapter 10

and further, by adding after the word “wagering”, in line 10, the following:-

. The commission shall transfer funds remitted under (c) for purposes of the Victims of Human Trafficking Trust Fund to the Treasurer following each remittance under this section

SECTION \_\_. Section 59 of chapter 23K of the General Laws, as so appearing, is hereby amended by striking subsection l in its entirety and inserting in place thereof the following:-

(l) 1.25 per cent to the Race Horse Development Fund established in section 60; and

(m) 1.25 per cent to the Human Trafficking Prevention Trust Fund established in section 66B of chapter 10.



TO: Chairman Crosby and Commissioners Cameron, Macdonald, Stebbins and Zuniga

FROM: Jill Lacey Griffin, Director Workforce, Supplier & Diversity Development

CC: Ed Bedrosian, Executive Director; Catherine Blue, General Counsel

DATE: May 25, 2017

RE: Summary - MGM Workforce Development Plan

---

### Today

Commissioners are scheduled to VOTE on the Workforce Development Plan originally presented on March 2, 2017 at MGC Public Meeting #211. Over the next few years and particularly gearing up for the gaming facility's massive hiring period just prior to opening, the MGM Springfield Workforce Development Plan will be a road map for maximizing the economic benefits for residents of the Commonwealth.

### Background

As part of the effort to ensure that Massachusetts residents benefit from the operational jobs created by casino development in the Commonwealth, the Massachusetts Legislature established in the Expanded Gaming Act requirements that casino licensees satisfy and produce for Commission approval an Affirmative Action Program for Equal Opportunity (the Affirmative Action Program). As referenced by Sections 18 and 21 of Chapter 23k of the Massachusetts General Laws and Massachusetts Gaming Commission Agreement to Award A Category 1 License to Blue Tarp Redevelopment, the Affirmative Action Program must describe how the licensee will identify and market employment opportunities to under and unemployed residents of the Commonwealth identified in c.23k 21 (20) and in consultation with the Massachusetts Department of Labor and Workforce Development to identify and market employment opportunities to unemployed residents of Massachusetts. **On January 22, 2015 at Public Meeting 143 MGC voted to approve "in principle with clarifications and amendments to come" the Affirmative Action Program for Equal Opportunity to identify and market employment opportunities to under and unemployed residents of the Commonwealth identified in c.23k 21 (22)**

MGM presented their operational Workforce Development Plan on March 2, 2017 at MGC Public Meeting #211 with information as requested by the Commission regarding the Affirmative Action Program for Equal Opportunity. The plan, to be reviewed in consultation with the MA Dept of Labor and Workforce Development is expected to identify and market employment opportunities to unemployed residents of MA and satisfy the requirements described above regarding employment and career opportunities at the MGM Springfield. The plan was also designed to meet MGM Springfield's commitments in their Host Community Agreement. The MGM Workforce Development plan was posted for public comment from March 6 to April 13, 2017. Additionally, we distributed the plan to the Governor's Skills Cabinet, MA Casino Career Training Institute (a collaboration of the Commonwealth's community colleges formed to meet the training needs of



Massachusetts Gaming Commission



the casino), the Hampden County Regional Employment Board, Career Centers and other stakeholder groups. Attached are the two comments that were received regarding the plan.

### Staff Comments

Included in MGM's Host Community Agreement with the City of Springfield are operational employment goals of hiring 35% Springfield City residents and 90% of their employees from the region. As referenced by Sections 18 and 21 of Chapter 23k of the Massachusetts General Laws and Massachusetts Gaming Commission Agreement to Award A Category 1 License to Blue Tarp Redevelopment, the Affirmative Action Program must describe how the licensee will identify and market employment opportunities to under and unemployed residents of the Commonwealth identified in c.23k 21 (20) and in consultation with the Massachusetts Department of Labor and Workforce Development to identify and market employment opportunities to unemployed residents of Massachusetts.

Staff believes that MGM has met the general requirements laid out in the law and gaming license to submit a Workforce Development Plan. However Commission staff requests that MGM provide within 90 days further details including process and timelines which specifically describe how MGM plans to meet their host community agreement employment goals of hiring 35% Springfield City residents. *This plan should include, but not be limited to, the following:* Inclusion of strategy and actions steps to support a greater number of adults in their efforts to achieve employability by MGM, including recruitment, training related to gaming skills, general customer service, hospitality and culinary skills.

### Recommendation

Vote to approve the MGM Workforce Development Plan, with the condition that within 90 days MGM provide further details to Commission staff regarding process and timelines specifically regarding how MGM plans to meet their host community agreement employment goals of hiring 35% Springfield City residents.



Massachusetts Gaming Commission



# MGM SPRINGFIELD

## WORKFORCE DEVELOPMENT PLAN

Massachusetts Gaming Commission  
March 2, 2017





# TABLE OF CONTENTS



I. INTRODUCTION	3
II. DEMOGRAPHICS OVERVIEW	9
III. WORKFORCE DEVELOPMENT	18
IV. RECRUITMENT STRATEGY	38
V. HIRING PLAN	49
VI. TRAINING PLAN	56
VII. KEY HIRES	62
VIII. MASTER TIMELINE	64





# INTRODUCTION





# INTRODUCTION



## **MISSION STATEMENT**

MGM Resorts International is the leader in entertainment and hospitality - a diverse collection of extraordinary people, distinctive brands and best-in-class destinations.

Working together, we create partnerships and experiences that engage, entertain and inspire.

## **COMPANY OVERVIEW**

MGM Resorts International develops, builds and operates unique destination resorts designed to provide a total resort experience, including first-class accommodations and dining, world-class entertainment, state-of-the-art meeting and convention facilities and high-quality retail and gaming experiences.

With over 72,000 employees, the Company is one of the world's leading global hospitality and entertainment companies with a portfolio of destination resort brands in Las Vegas, including Bellagio, MGM Grand, Mandalay Bay and The Mirage, as well as Excalibur, Luxor, New York-New York, Monte Carlo and Circus Circus. MGM Resorts International also holds a 50 percent interest in CityCenter, the iconic hotel, convention, retail and dining complex at the heart of the Las Vegas Strip featuring ARIA Resort and Casino, Vdara Hotel and Spa, Mandarin Oriental Las Vegas and Veer condominiums.





# INTRODUCTION



MGM Resorts International operates market-leading U.S. regional assets including Beau Rivage and Gold Strike Tunica in Mississippi, MGM Grand Detroit in Michigan and Borgata in New Jersey. The Company is in the process of developing MGM Springfield in Massachusetts, and recently completed work on the newly opened MGM National Harbor in Maryland. We also have a 56 percent interest in MGM China Holdings Limited, which owns the MGM Macau resort and casino and is in the process of developing a resort on Cotai. MGM Resorts controls and holds a 76 percent economic interest in the operating partnership of MGM Growth Properties LLC, a premier triple-net lease real estate investment trust engaged in the acquisition, ownership and leasing of large-scale destination entertainment and leisure resorts.

We're proud to be recognized for our commitment to being socially responsible, including an industry-leading diversity and inclusionary culture, community engagement and philanthropy initiatives and a commitment to environmentally sustainable approaches in development and operations.

We have been consistently ranked among the top 500 of *Newsweek* Magazine's listing of green companies.

PR News has recognized MGM Resorts as an Overall Leader in CSR Practices while our Chairman & CEO has been recognized as a Responsible CEO of the Year by *Corporate Responsibility* Magazine. *Fortune* Magazine has named MGM Resorts one of the World's Most Admired Companies.

While we operate leading resorts and amenities, ultimately it is the people of MGM Resorts that make the difference daily in providing our customers with the ultimate guest experience. We welcome you to visit us.





# MGM RESORTS INTERNATIONAL EXECUTIVE COMMITTEE



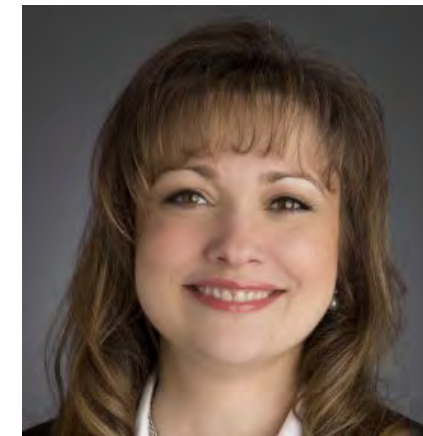
Jim Murren  
Chairman & CEO



Dan D'Arrigo  
Chief Financial Officer



Michelle DiTondo  
Chief Human Resources  
Officer



Elisa Gois  
Chief Analytics Officer



Bill Hornbuckle  
President



Phyllis James  
Chief Corporate  
Responsibility Officer



John McManus  
General Counsel



Anton Nikodemus  
Regional Operations Chief  
Operating Officer



Chris Nordling  
President  
Corporate Entities



Corey Sanders  
Chief Operating Officer



Lillian Tomovich  
Chief Experience Officer



# REGIONAL OPERATIONS



Anton Nikodemus  
COO Regional Operations



Jorge Perez  
SVP, Chief Financial Officer



Laura Lee  
SVP, Human Resources



Vonda Harris  
VP, Labor Relations



Danielle White  
VP, Community Engagement



Wanda Smith-Gispert  
VP, Talent & Workforce  
Development



Gina Peters  
VP, Finance



John Forelli  
VP, Information Technology



Dwight Yang  
VP, Revenue Management



## **WRITING THE NEXT CHAPTER TOGETHER**

The City of Springfield draws its strength from the people who have been living and working in this Western Massachusetts community on the Connecticut River for 375 years.

The city and its people have a proud and vibrant history. On the heels of a difficult downturn in the economy that threatened Springfield's once thriving downtown, the city's proud past and hearty people were challenged by another first when a tornado nearly leveled a section of Downtown Springfield in June 2018.

And while the most tragic memories of that event will never be forgotten, this is a resilient city with determined people who already have begun to set the stage for an epic comeback story.



Michael Mathis  
President, COO



Seth Stratton  
VP, General Counsel



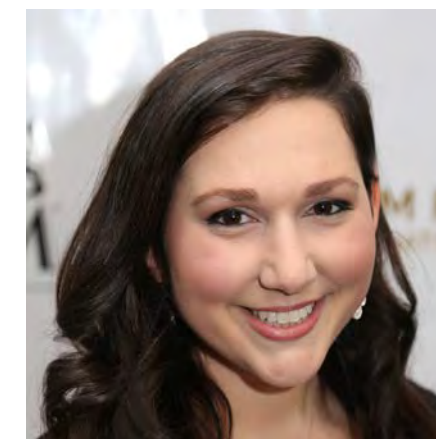
Courtney Wenleder  
VP, Chief Financial Officer



Michael Custodio  
Director, Property Initiatives



Markikate Murren  
Director, Human Resources



Amanda Gagnon  
Executive Assistant to  
President and VP



Anita Bird  
Coordinator, Human Resources



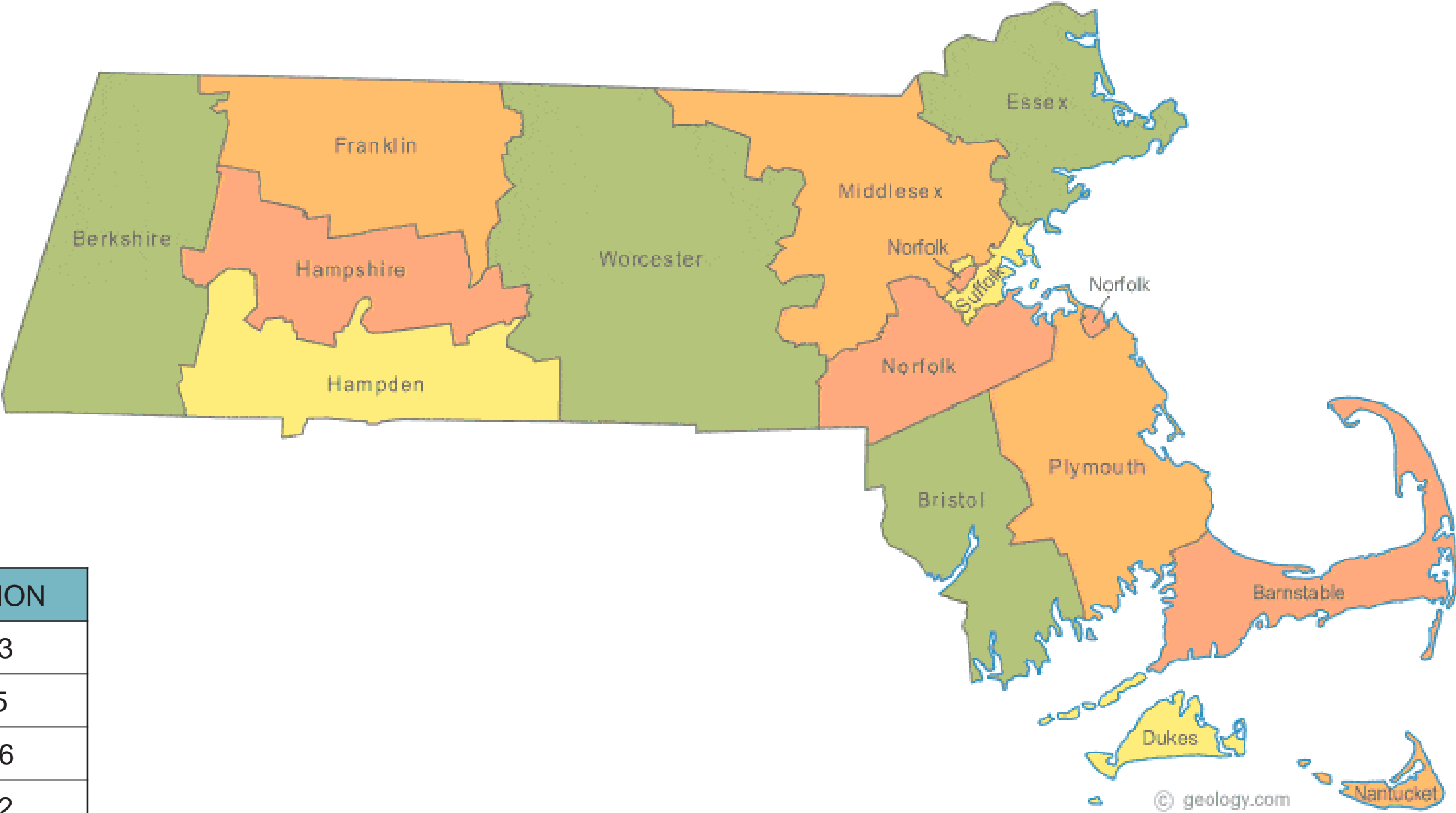


# DEMOGRAPHICS OVERVIEW





# DEMOGRAPHICS OVERVIEW



**WESTERN MASSACHUSETTS**

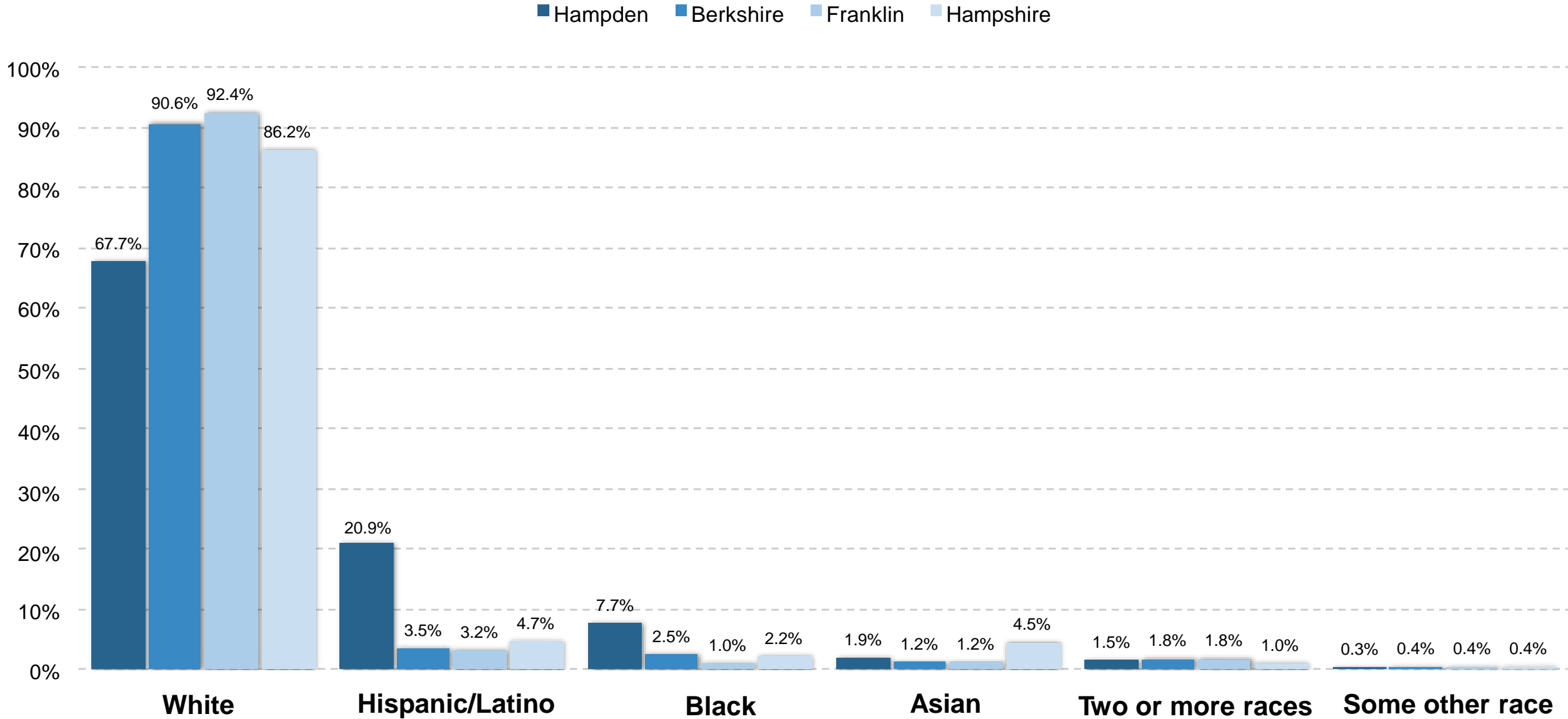
COUNTY	POPULATION
Berkshire	161,303
Franklin	32,205
Hampshire	160,936
Hampden	558,162

City-data.com 2017

# DEMOGRAPHICS OVERVIEW



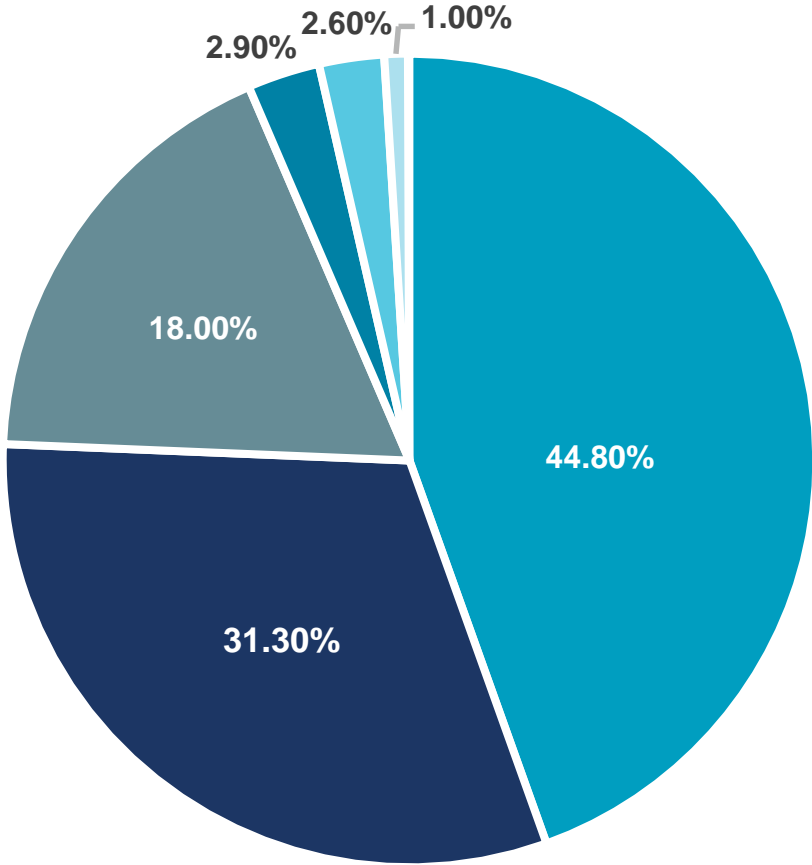
## WESTERN MA COUNTY DEMOGRAPHICS



City-data.com 2017

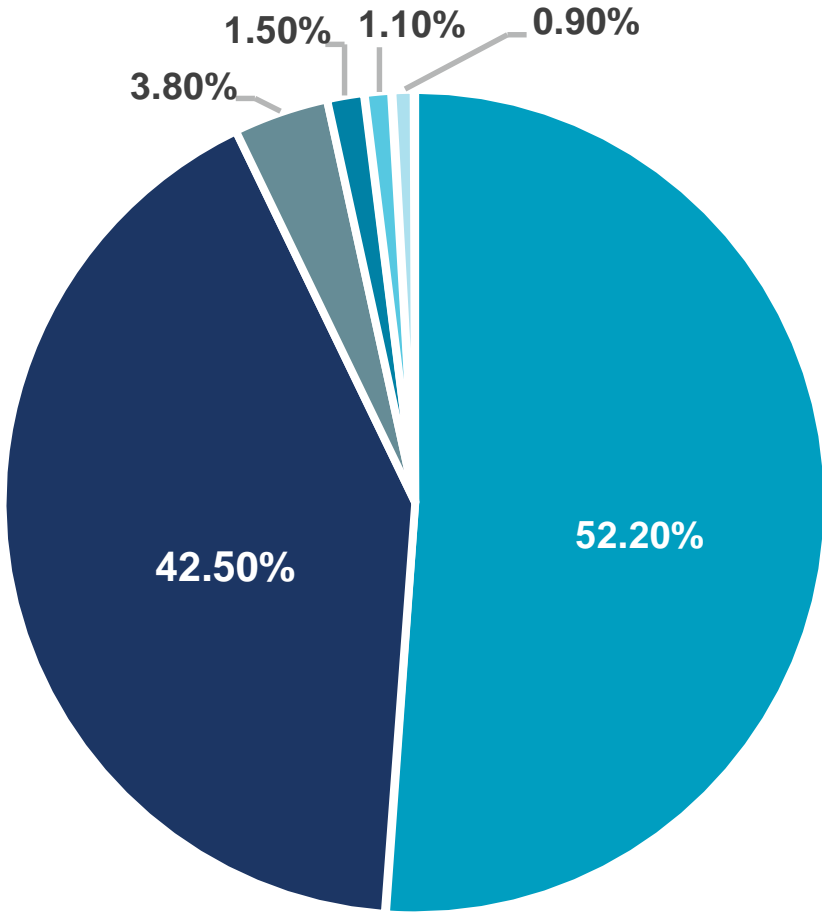


# DEMOGRAPHICS OVERVIEW



Springfield

- Hispanic | Latino
- White
- Black
- Asian
- Two or more races
- Other

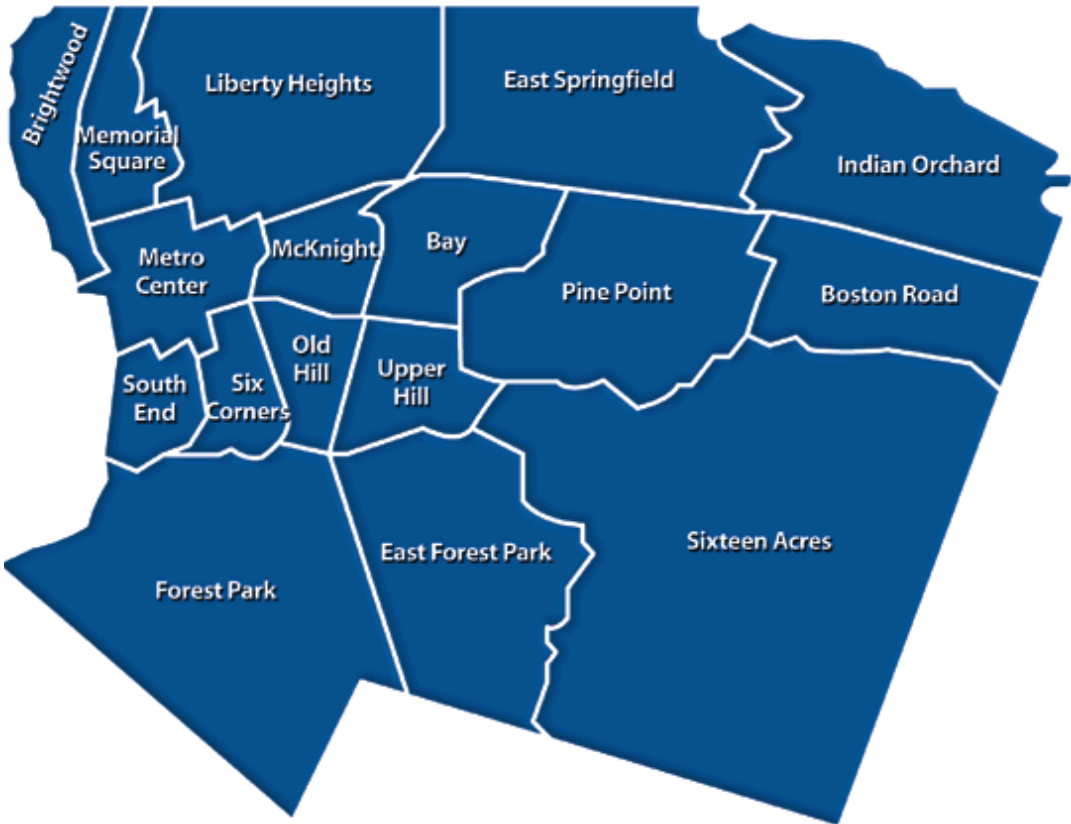
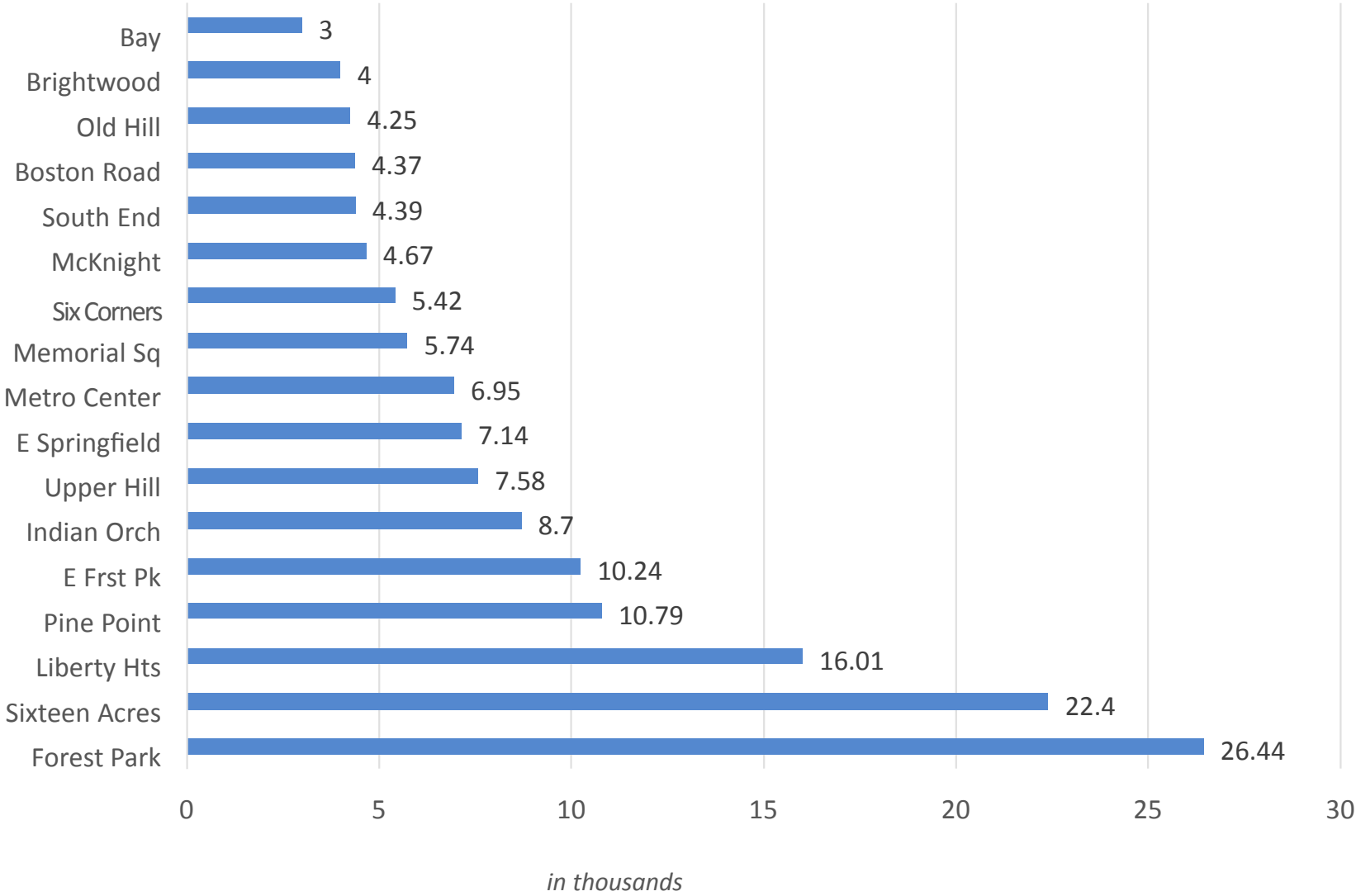


Holyoke

City-data.com 2017

# DEMOGRAPHICS OVERVIEW

Total Population by Neighborhood



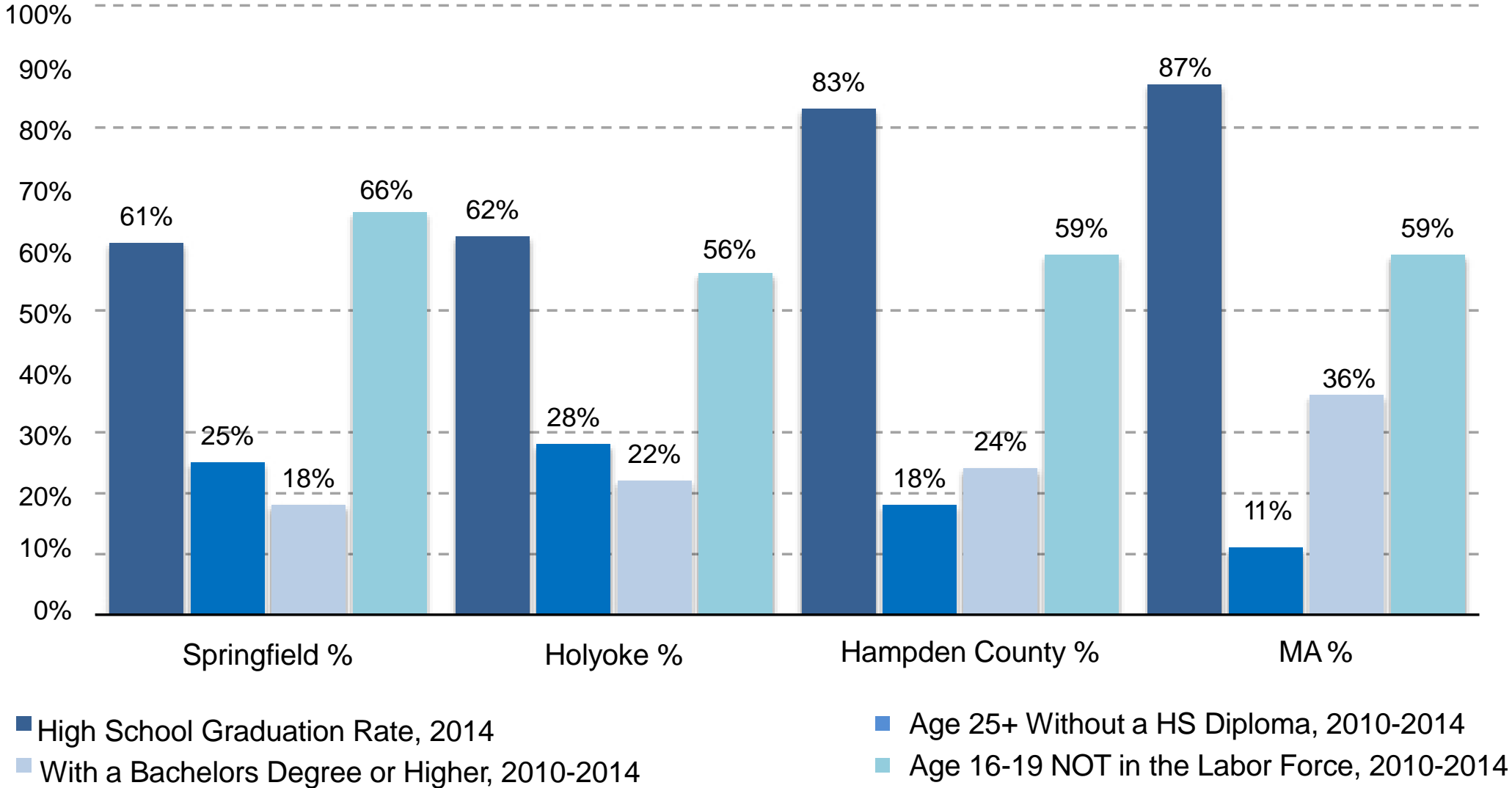
[statisticalatlas.com/neighborhood/Massachusetts/Springfield](https://statisticalatlas.com/neighborhood/Massachusetts/Springfield)



# DEMOGRAPHICS OVERVIEW



## EDUCATION ATTAINMENT



American Fact Finder, Educational Attainment, Characteristics of Teenagers- 2010-2014 American Community Survey 5 Year Estimates

# DEMOGRAPHICS OVERVIEW



## LABOR FORCE PARTICIPATION

AREA	LABOR FORCE	EMPLOYED	UNEMPLOYED	UNEMPLOYMENT RATE (%)
Hampden County	221,067	212,625	8,442	3.8
Springfield	62,563	59,310	3,253	5.2
Agawam	15,905	15,442	463	2.9
Chicopee	27,381	26,365	1,016	3.7
East Longmeadow	8,668	8,452	216	2.5
Holyoke	15,998	15,294	704	6.4
Longmeadow	8,118	7,948	170	2.1
Ludlow	10,858	10,427	431	4.5
West Springfield	14,558	14,098	460	3.2
Wilbraham	7,565	7,376	189	2.5

Career Trends by GRAPHIQ [unemployment-rates.careertrends.com//1893/Hampden-County-MA](https://unemployment-rates.careertrends.com//1893/Hampden-County-MA)



# DIVERSITY & INCLUSION PLAN



*Adopted by Blue Tarp reDevelopment LLC – Approved on: January 22, 2015*

## **ARTICLE VI Operational Phase Diversity Program for Equal Opportunity**

MGM Springfield's Diversity Program for Equal Opportunity for Employment of Covered Employees During Operations of the Gaming Establishment pursuant to G.L. c. 23K, §21 (20); License Condition 12; and HCA Exhibit C.

MGM Resorts International ("MGM") has been the pioneer in diversity and inclusion in the gaming and hospitality industry since its voluntary adoption of its Diversity Initiative in 2000. MGM regards diversity as an essential business paradigm for success in the modern global economy. Hence, Diversity and Inclusion are the foundation of MGM's culture of Integrity, Teamwork and Excellence. MGM has systematically incorporated diversity into its Company's value system, organizational culture and its business operations, as a matter of progressive business policy for itself, its affiliates and subsidiary companies.

MGM Springfield is committed to hiring and maintaining a diverse, multiracial and multicultural workforce which is reflective of its host community and customer base. We recognize that diversity without inclusion is incomplete. We cultivate respect for the humanity and contributions of every individual employee because our employees are our lifeblood. We realize that, to achieve the highest level of performance of our teams, and to deliver genuinely superior service to our guests, we must motivate each employee to perform at his/her highest levels each and every day. We, therefore, foster an inclusive culture of excellence, enterprise-wide, aligned with our business mission – organized around universal employee engagement, individual responsibility, individual empowerment to express diverse opinions and perspectives, inspired leadership, consistent peak performance, team collaboration, innovation, accountability and, above all, positive recognition for a job well done. Diversity and Inclusion promote greater unity in our Company around a shared common vision in achieving our business mission.

*NOTE: A single individual may satisfy multiple categories of Covered Employee and in such cases shall be recorded and counted by MGM Springfield in each of the applicable categories. However, regardless of how many categories of Covered Employees which an individual may satisfy, no single individual shall be counted more than once in the accumulation of totals for reportage of utilization of Covered Employees.*

**Tactical Steps For Identifying, Training and Employing Covered Employees.** In addition to the steps outlined in the HCA Exhibit C, which shall be fully incorporated herein by reference, MGM Springfield shall use best efforts to consider and implement the following tactical steps for its recruitment of Covered Employees:

## **1. ADVERTISEMENT AND PROMOTION OF EMPLOYMENT OPPORTUNITIES**

MGM Springfield shall advertise and promote employment opportunities by:

- i. posting all opportunities on its mgmspringfield.com and related workforce development site and Massachusetts JobQuest;
- ii. periodically using traditional media and social networking tools to assist MGM Springfield in advertising employment opportunities; and
- iii. partnering with key community stakeholders including but not limited to local educational institutions and career centers to hold job fairs, advertise employment opportunities and otherwise to make outreach to the local labor pool.

## **2. TRAINING AND ASSISTANCE FOR FRONTLINE STAFF**

a. Frontline Training (Career Progression Programs). Career Progression Programs will be provided for Covered Employees, enabling them to be competitive for promotion into key management and executive positions throughout the integrated MGM Springfield resort. As skills and experience levels increase, employees will find a variety of opportunities for career growth within the Company. Comprehensive jobs skills training and opportunities to continue their education also will be provided by MGM Springfield, and through educational partnerships, which shall include:

- i. on-the-job training programs;
- ii. either classroom or online training opportunities designed to improve core skill sets required for consideration for promotions and new opportunities within MGM Springfield;
- iii. specifically designed programs aimed at helping U.S. Veterans leverage their military leadership skills while transitioning into management or other positions within MGM Springfield;

- iv. professional development programs designed specifically for experienced supervisors and assistant managers to broaden their skills, abilities and knowledge base;
  - v. mandatory Diversity Workshops for all supervisory employees; and
  - vi. offering apprenticeship and internship programs in order to provide real life training to local students from community colleges and recent college and university graduates. The MGM Springfield Human Resources Department will track the number of Covered Employees who have jobs in executive, finance, information technology and administrative positions and report this information to the Diversity Compliance Team. While all positions will be filled by qualified candidates, MGM Springfield shall use its best efforts to train Covered Employees to qualify for all positions and have the opportunity to advance their careers through its Career Progression Programs.
- b. English as a Second Language. MGM Springfield will offer English as a Second Language Classes to project Covered Employees as part of its obligations under Exhibit C of the HCA.
- c. Basic Skills Training (Job Readiness). MGM Springfield acknowledges that a significant number of potential employees in the City and surrounding area will need to attain a high school equivalence in order to qualify to apply for jobs at the Project. Thus, MGM Springfield will use its best efforts to ensure that potential employees are able to participate in programming offered by local outreach organizations, including FutureWorks, CareerPOINT, the regional employment boards, BerkshireWorks and Westover Job Corp Center, as well as local educational and training institutions, such as Holyoke Community College, Springfield Technical Community College and the Massachusetts Casino Careers Training Institute. MGM Springfield will make best efforts to collaborate with and support the above listed organizations (as well as others) to form educational partnerships with the stated goal of significantly reducing the number of unemployed persons with less than a high school education prior to the time when jobs become available at MGM Springfield.

Each of the educational partnerships to be formed by MGM Springfield will focus on providing basic core skills to City residents as well as residents of the surrounding area, including:

- i. basic math and literacy skills;
- ii. vocational training for hospitality and non-hospitality related careers; and
- iii. job preparation skills such as interviewing, resume writing and effective work habits.

- d. Hospitality Career Information Workshops (Job Readiness Training). Job Readiness Training will be designed to introduce local residents to the hospitality industry and foster interest in these types of jobs. Career information workshops will be conducted prior to and during the mass recruiting phase of MGM Springfield. The goal will be to introduce local residents to the wide range of occupations that are available in the hospitality industry, including hotel front desk representatives, computer operators, facilities engineers, financial analysts, culinary arts positions, guest service ambassadors, marketing professionals, human resource representatives, table games dealers, slot technicians and representatives, cage clerks and many more. Local residents will be able to attend career information workshops to learn about the wide range of occupations available and the skills and qualifications that would be required to work in such positions.

MGM Springfield will hold career information workshops throughout the greater Springfield area. While attending the career information workshops, participants will have the opportunity to provide information on job interests and sign up to receive first notice on training and job announcements.

- e. Apprenticeships. MGM Springfield will cooperate with local organizations including but not limited to Holyoke Community College and Springfield Technical Community College to develop and implement apprenticeship programs for employees (including Covered Employees) who wish to expand their skills and knowledge, and develop their career. The apprenticeship programs will be designed to provide a structured, on-the-job training process from basic mechanical skill requirements to advanced techniques required for the specified trade or service.
- f. Coordination with Career Centers. MGM Springfield will work with local career centers to promote job opportunities at the Project and coordinate resources for Springfield area residents to improve workforce skills.

### **3. AFFIRMATIVE MARKETING FOR THE UNEMPLOYED PURSUANT TO LICENSE CONDITION 15**

In addition to those steps outlined above and consistent with License Condition 15, MGM Springfield will develop, in consultation with the Executive Office of Labor Workforce Development and related state and local agencies, a plan to identify and market employment opportunities at the Gaming Establishment to unemployed residents of Massachusetts.





# WORKFORCE DEVELOPMENT





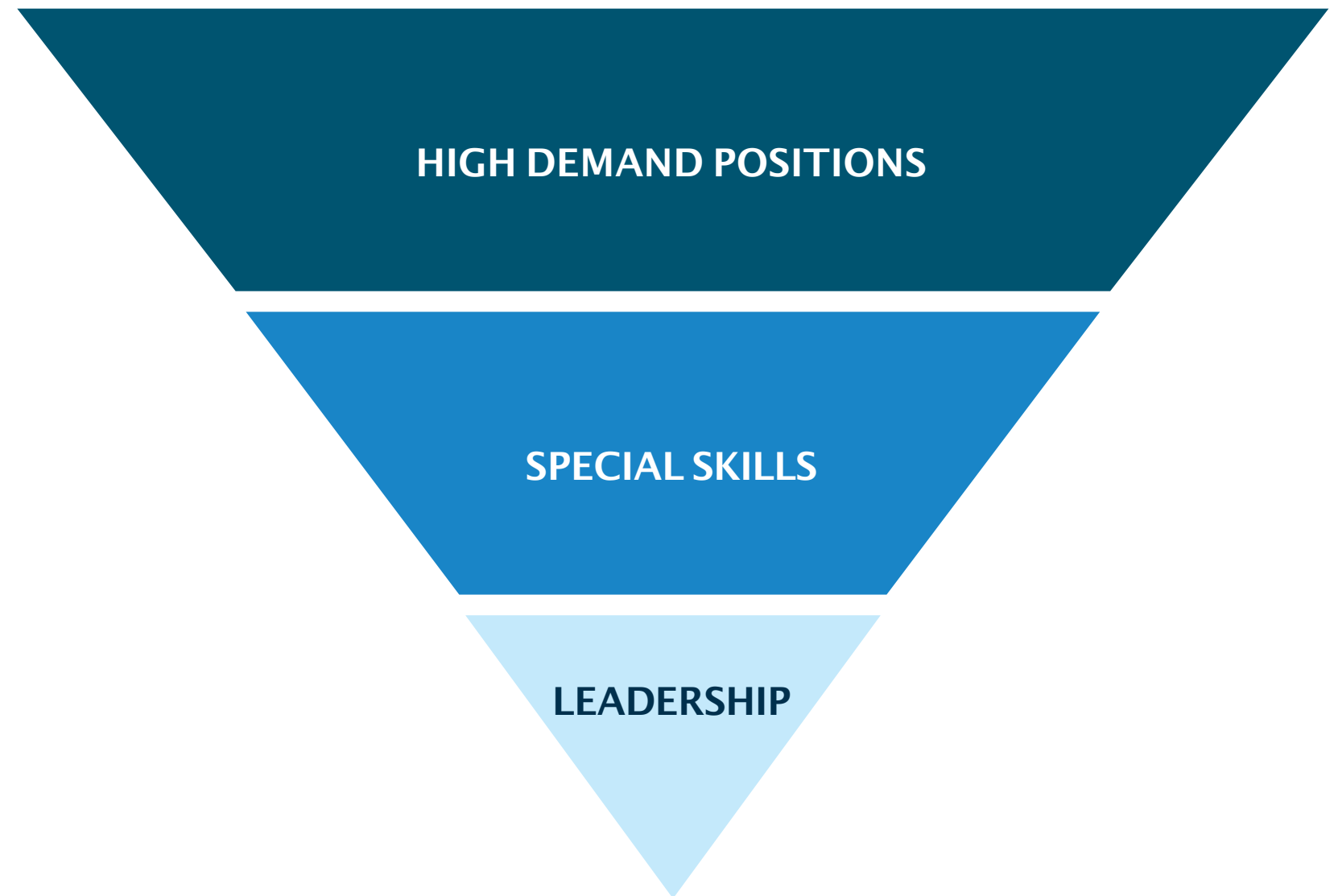
The MGM Springfield Regional Workforce Development Plan was designed to address the future demand for workers in the region's hospitality and gaming sectors.

The plan focuses on:

- Preparing our future workforce to meet MGM Springfield's long-term employment opportunities
- Facilitating the connection between current workforce to align skills and interests with real work opportunities
- Developing a clear picture of workforce development opportunities in the region to guide career planners as they prepare themselves for the workforce

**TABLE 1:**  
High Demand Positions (Head Count 50+)

POSITION	ESTIMATED HIRES
Utility Porter	145
Cook	139
Cocktail Server	96
Kitchen Steward	75
Cashier	71
Server	61
Bartender	56
Fountain Worker	50
Busser/Runner	57





**MGM SPRINGFIELD OFFERS A WIDE RANGE OF CAREERS THAT EXPAND ACROSS MULTIPLE SECTORS**

There is a critical demand for professional, leadership and gaming positions that will increase advancement opportunity and offer careers that are new to the region.



## CASINO

- Shift Manager
- Pit Manager
- Floor Supervisor
- Dealer
- Poker Room Dealer
- Cage Cashier
- Count Team Supervisor
- Count Team Attendant
- Slot Technician

## SECURITY / SURVEILLANCE

- Security Shift Manager
- Security Training Manager
- Security Assistance Manager
- Lost and Found Clerk
- Security Officer
- Locksmith
- Director Surveillance
- Surveillance Technician

## HOTEL OPERATIONS

- Front Desk Manager
- Front Desk Representative
- Concierge
- Training Development Manager
- Front Services Supervisor
- Housekeeping Director
- Housekeeping Supervisor
- House person
- Housekeeping Director

## ENTERTAINMENT

- Ticket Office Supervisor
- Ticket Office Cashier
- Bowling Technician
- Bowling Receptionist
- Technical Services Manager
- A/V Technicians
- Entertainment Coordinator
- Cashier Ticket Office
- Entertainment Coordinator

## FOOD & BEVERAGE

- Restaurant General Manager
- Assistant Beverage Manager
- Sommelier
- Food Server
- Bartender
- Bartender Apprentice
- Fountain Worker
- Banquet Manager
- Banquet Supervisor
- Banquet Server

## INFORMATION TECHNOLOGY

- Director Information Technology
- Manager Technology Support
- Technical Support Engineer
- Application Support Analyst
- IT Security Analyst
- Director Technical Svcs
- Admin IT Security

## GENERAL & ADMIN

- HR Business Partner
- Talent Acquisition Specialist
- Financial Analyst
- Accountant
- Uniform Control Attendant
- Accounting Manager
- Accounting Records Clerk
- Communications Specialist
- Graphic Designer
- Social/Digital Specialist

## CULINARY

- Executive Sous Chef
- Executive Pastry Chef
- Pastry Chef
- Baker
- Restaurant Sous Chef
- Restaurant Cook
- Kitchen Steward
- Pantry Worker
- Head Butcher
- Butcher

MGM Resorts is the employer of choice within our industry. MGM Springfield's hiring and training plan will incorporate the market-leading hiring and training programs and practices used at our properties, which employ more than 72,000 team members nationally and internationally.

The sections that follow are organized as follows:

- Job Creation
- Recruitment and Placement

Upon opening, MGM Springfield anticipates that it will create approximately 3,000 direct permanent jobs. MGM Springfield is committed to ensuring that these jobs will go to Springfield area residents in need of meaningful employment and that the jobs will provide growth opportunities. In order to do that, residents in the area will need to be prepared for the jobs.

According to Labor Market Trends in the Pioneer Valley in 2008 – 2010, those with less than a high school education accounted for 24.4% of the unemployed but were only 10.1% of the civilian labor force. This means that significant numbers of potential workers in the area will need to attain a high school equivalence in order to qualify to apply for a job at MGM Springfield.

We intend to work with local outreach organizations, including FutureWorks, CareerPOINT, the regional employment boards, BerkshireWorks, Westover Job Corp Center and Staffing, as well as local educational and training institutions, such as Holyoke Community College and the Massachusetts Casino Careers Training Institute.

Our goal will be to significantly reduce the number of unemployed with less than a high school education prior to the time when jobs would become available at MGM Springfield. By improving education levels, Springfield area residents will have more opportunities for possible future employment.

In addition, through our education partnerships, MGM Springfield intends to work with these and other community agencies to create permanent resources for Springfield area residents to improve workforce skills, including:

- Basic math and literacy skills
- Vocational training for hospitality and non-hospitality related careers
- Job preparation skills such as interviewing, resume writing, etc.

Our focus at MGM Springfield will be to not only create jobs, but also to train potential workers in the Springfield area to be qualified for these jobs.

At MGM Springfield, the key to our success will be the investment in people and in the larger Springfield community. Our employees will provide the exceptional service and welcoming hospitality that will encourage patronage and keep visitors returning again and again. MGM Resorts International is a leader in the hospitality industry, and from our experience, we know that exemplary customer service ultimately results in increased visits, extended lengths of stay per visit and a continually growing market of new visitors. MGM Springfield recruitment and placement programs will be designed to support the efforts of the City of Springfield to increase tourism, create a strong skills base in hospitality and hire a local workforce that will include full-time and part-time positions at all levels of employment.

MGM Resorts embraces equality and diversity in its recruitment and employment practices and will reach out to all sectors of the Springfield community. Occupations created by MGM Springfield will include positions in the following categories of career occupations: Hotel Operations, Food and Beverage, Gaming, Marketing, Retail, Human Resources, Administration, Finance, Entertainment and many more.

MGM Springfield will provide comprehensive job skills training plans to target Springfield area residents with no previous related experience for many of the available positions. This will be accomplished through the creation of a comprehensive pre-employment recruiting and training program referenced in the Training and Development section of this document.



# JOB CREATION

Career progression opportunities will be provided for Springfield workers, enabling them to be promoted into key management and executive positions throughout the integrated MGM Springfield resort. As skills and experience levels increase, employees will find a variety of opportunities for career growth within the Company. Comprehensive jobs skills training and opportunities to continue their education also will be provided by MGM Springfield and through programs with local and regional educational institutions. MGM Resorts has a history of successful employment and training programs in the communities where we do business.

MGM Springfield intends to partner with local employment outreach and other community agencies, which may include:

- FutureWorks
- CareerPOINT in Holyoke
- BerkshireWorks in Pittsfield
- Westover Job Corps Center
- Regional Employment Board of Hampden County
- Franklin Hampshire Regional Employment Board
- Staffing Agencies
- ROCA
- Urban League of Springfield
- NAACP Chapter in Springfield
- National Council of La Raza
- Latino Chamber of Commerce in Springfield





We will utilize the services of these agencies and organizations to assist us in recruiting candidates for employment. MGM Springfield will implement an assertive recruiting plan to create awareness and foster interest in the jobs we provide. Working with these organizations, our community outreach programs will target the unemployed and underemployed, minorities, youth and seniors.

Preferential recruiting will be initially aimed at Springfield residents through an MGM Resorts-sponsored program called First Choice. MGM Springfield is committed to providing the First Choice recruitment program in partnership with the Massachusetts Casino Careers Training Institute and other community groups that will provide residents the first opportunity to learn about and apply for positions at MGM Springfield.

The First Choice program also will provide outreach services to economically isolated residents, persons with disabilities and residents in disadvantaged areas in Springfield, with a focus on the unemployed and underemployed, as well as minority, women and Veteran recruitment, to encourage Springfield residents to apply for jobs available at MGM Springfield.

MGM Springfield has plans to fill 35% of available direct jobs with Springfield residents, and 90% from the Greater Regional area.

The **Employment Outreach Program and First Choice** will include the following strategies:

- Continuing to establish contacts in the Springfield community and actively recruiting
- Utilizing FutureWorks community information network, CareerPOINT, regional employment boards and other community partners
- Advertising through broadcast, print and social media
- Conducting community-based job fairs
- Working with regional employment boards to promote job opportunities through sports and leisure venues, such as leisure centers, and utilizing the MassMutual Center as an initial job fair site
- Online application process for easy accessibility
- Casino career information sessions
- Investing in local youth as key employees of the future
- Helping people move from welfare into the workforce
- Striving to create hope, provide motivation and decrease the perception of “hopeless unemployment rates”
- Striving to decrease the unemployment rate, thereby giving Springfield residents and their families more purchasing power, which will serve to improve the local economy

We also will recruit a limited number of people who would transfer from existing gaming properties. The primary objective of these transfers will be to provide training to local residents so the residents can ultimately transfer into these positions





# SPRINGFIELD'S EDUCATIONAL AND TRAINING SUPPLY CAPACITY



Education and training programs are critical to the success of Workforce Development. The infrastructure needed to ensure employers have a viable pipeline to skilled workers is essential. MGM Resorts in partnership will source candidates from these Federally Approved Regional Training Providers.

COMPANY	PRIMARY TRAINING	NONPROFIT / FOR PROFIT
American Red Cross	Certificate or AS Degree	NP
Asnuntuck Community College	Certificate or AS Degree	NP
Bay Path University	Certificate or AS Degree	Private
Bryant University	Business Management Certificate Program	Private
CNS Academy for Healthcare Professionals, Inc.	Certificate or AS Degree	Private
Cardno ATC	Asbestos Abatement Supervisor	Private
Chicopee Industrial Contractor	OJT Chicopee Industrial-WB	Private
Collaborative for Educational Services	Certificate or AS Degree	NP
Computer Training of America, Inc.	Certificate or AS Degree	Private
Construction Training LLC	Heavy Equipment Operations Program II	Private
Corporate Training Center	Certificate or AS Degree	Private
Creative School of Hairdressing, Inc	Barboring	Private
DiGrigoli School of Cosmetology	Cosmetology	Private
Greenfield Community College	Certificate or AS Degree	Public
Holyoke Community College	Certificate or AS Degree	Public
Holyoke Works	Certificate or AS Degree	NP
Kay Harvey Academy	Cosmetology	Private
Lincoln Technical Institute - E. Windsor	Certificate or AS Degree	Private
Lincoln Technical Institute - Hartford	International Baking & Pastry	Private
Marinello Schools of Beauty	Certificate or AS Degree	Private

# SPRINGFIELD'S EDUCATIONAL AND TRAINING SUPPLY CAPACITY (CHART CONTINUED)



COMPANY	PRIMARY TRAINING	NONPROFIT / FOR PROFIT
Monarch School of Cosmetology	Certificate or AS Degree	Private
New Horizons Computer Learning Center	MCSE/Network Security	Private
NH Boston, LLC	Web Design	Private
NHCLC Nashua, LLC	PMP (Project Management Professional)	Private
Network Technology Academy Institute	Certificate or AS Degree	Private
New England Business Educational Systems, Inc	Certificate or AS Degree	NP
New England Tractor Trailer	Certificate or AS Degree	Private
OJT-Commonwealth Care Alliance	OJT Community Health Worker	Private
Porter and Chester Institue	Certificate or AS Degree	Private
Premier Education Group	Certificate or AS Degree	Private
Salem State University	Administrative Medical Specialist	Public
Salter College	Certificate or AS Degree	Private
Springfield Technical Community College	Certificate or AS Degree	Public
Training Resources of America, Inc.	Nurse Aide/Home Health Aide	Private
Tri-State CDL Training Center	Certificate or AS Degree	Private
United Tractor Trailer School, Inc.	Certificate or AS Degree	Private
University Walls-UMass Amherst	University Without Walls	Public
University of Mass-Lowell	Website Design & Development	Public
University of Mass-Amherst	Second Bachelor's Degree Track in Nursing	Public
Westfield State University	Certificate or AS Degree	Public
William George Associates	PMP/CAPM Plus Agile/Scrum Certification	Private



# BREAKING DOWN BARRIERS



***BREAK DOWN BARRIERS—A PLAN TO “RISE TO THE CHALLENGE”***

Many environmental aspects may impact Workforce Development initiatives by presenting opportunities or challenges. To plan accordingly, the table below provides several topics and associated questions that may arise during the WFD planning or development process.

CONCERN	RECOMMENDATIONS TO EXPLORE
<p><b>Need additional work experience or training</b></p>	<p>MGM Springfield has provided all prospective candidates the option to utilize SkillSmart to assist in identifying any skills gap at no cost. SkillSmart is a system that provides a user’s interface to compare a resume to any position offered by MGM Springfield and receive information on what is needed to prepare for the desired position.</p> <p>MGM Springfield has partnered with over 20 community organizations that will provide training solutions to prepare job seekers for a variety of career opportunities.</p>
<p><b>Criminal Backgrounds</b></p>	<p>Individuals may petition Office of the Commissioner of Probation (OCP) to seal certain eligible criminal convictions.</p> <p>MGM Springfield will partner with community business organizations that will assist by holding record sealing events to promote awareness.</p>
<p><b>Access to childcare</b></p>	<p>MGM Springfield intends to provide a childcare solution option through a partnership with HCS Head Start, Inc.</p> <p>HCS Head Start, Inc. has been providing high-quality early childhood education services for children and families. Head Start provides a solid foundation for children to gain necessary skills to enter kindergarten and to be successful in life. The center will be fully licensed by the MA Department of Early Education and Care.</p>
<p><b>First time job seekers</b></p>	<p>MGM Springfield will offer a number of entry-level positions for first time job seekers. Prospective candidates without prior work experience are encouraged to apply. Also, there are multiple volunteer opportunities available through United Way and others to allow first time job seekers to gain skills that we will consider as work experience.</p>

TABLE 2: Known Environment Considerations

# WORKFORCE DEVELOPMENT RESOURCES



Community-based organizations are nonprofit groups that work at a local level to improve life for residents. The focus is to build equality across society in all streams – quality of education, access to technology, access to spaces and information for the disabled and to provide services that impact barriers to workforce development. Through our partnership with the Working Cities Challenge, MGM Springfield will target populations within the low income residents of the city in the following areas, to conduct onsite career sessions and notify each entity of all job postings:

- Youth 18-24 with a HSD, GED or HiSET
- Adults 18-55+ without a HSD, GED or HiSET
- Adults 18-55+ living at or below poverty

AGENCY	TARGET POPULATION(S)	CAREER READINESS	FINANCIAL LITERACY	ADULT / YOUTH LITERACY
AISS (After Incarceration Support System)	Formerly incarcerated	x		
Annie's House MHA	Chronically homeless women			
Arise for Social Justice	Low income population			
Center for Human Development	Youth/adults	x	x	x
Dress for Success	Women			
Gandara Center	Ethnic Minorities with mental health disorders	x		x
Goodwill Industries	People with special needs and barriers to employment	x		
HAP Housing	Low income population	x	x	
Hartspring Foundation, Human Resources Foundation (Big Brothers Big Sisters of Hampden County)	At risk children			
Home City Housing	Low income/vulnerable population		x	x
Housing First Program (Springfield Housing Authority)	Low income population	x	x	x
Human Resource Unlimited	People with mental and physical disabilities/ disadvantaged population	x		
Human Resource Unlimited Move to Work	People with disabilities	x		
Human Resource Unlimited-Lighthouse	People with mental illness	x		x
Jump Start HCC	Unemployed/unskilled	x		



# WORKFORCE DEVELOPMENT RESOURCES (CHART CONTINUED)



AGENCY	TARGET POPULATION(S)	CAREER READINESS	FINANCIAL LITERACY	ADULT / YOUTH LITERACY
Junior Achievement	Youth/adults	x	x	
Mass Rehab Commission	People with disabilities	x		
Mom Squad/Square One	Mothers who are homeless/at risk of homelessness	x		
New England Business Associates	Individuals with disabilities	x		
Scattered Sites Shelter/NEFWC	Homeless families	x		
Secure Jobs Connect	Homeless single mothers	x		
SMOC	Low income population/female ex-offenders	x		x
Soldier On	Veterans	x	x	
Spfld Housing Authority	Low income population	x	x	x
Springfield Family Support Program	Low income population			x
Springfield Partners for Community Action	Low income population		x	
Suit up Springfield	Young men	x		
Square One	Low income population	x		
Tech Foundry	Low income youth	x		
The Consortium-Bridging the Opportunity Gap	Young adults	x		
Training Resources of America	Youth/adults	x		x
Westover Job Corps Center	Low income youth	x		x
Work Opportunity Center	Individuals with disabilities	x		
YMCA of Greater Springfield	Youth/adults	x	x	
YWCA of Western MA	Low income women	x		x
<b>Total Providing Services</b>		<b>28</b>	<b>9</b>	<b>11</b>



## **TRAINING AND WORKFORCE OPTIONS (TWO)**

A partnership with the two community colleges in the area: Holyoke Community College and Springfield Technical Community College

**Programs | Services:** Hospitality Courses, Certification Courses, Culinary Program, Workforce Development; ABE, ESOL, job readiness and a resource provider for SkillSmart

**Nature of Relationship:** Education Institution



## **NEW ENGLAND FARM WORKERS' COUNCIL**

In addition to migrant and seasonal farm workers and their families, the agency serves inner-city, low-income groups, particularly Hispanic in western and north-central Massachusetts, central Connecticut, Rhode Island and southern New Hampshire

**Programs | Services:** Employment counseling, classroom training, Commercial Driver's License (CDL) training, job search assistance, job placement and on-the-job training

**Nature of Relationship:** Workforce Development



## **MASSACHUSETTS CASINO CAREER TRAINING INSTITUTE (MCCTI)**

A partnership with the 14 community colleges in the Commonwealth; STCC and HCC are the leads for MGM Springfield

**Programs | Services:** Dealer School, Poker School, Surveillance School and a resource provider for SkillSmart

**Nature of Relationship:** Education Institution Collaboration



## **COMMONWEALTH OF MASSACHUSETTS**

A partnership with educational institutions, service organizations and other businesses across Massachusetts to provide employment opportunities, placement, training and support to all residents and Veterans in need

**Programs | Services:** Employment resources, career development, funding and other assistance source of information

**Nature of Relationship:** Workforce Development





## **FUTUREWORKS CAREER CENTER**

A partnership with On The Job Training, the Workforce Training Fund and Workshare; amongst other local organizations including nonprofits, community colleges and governmental organizations

**Programs | Services:** Provide “soft skills” training to MGM Springfield candidates, pre-screen candidates for employment, partner in select MGM Springfield career events, particularly those in Springfield

**Nature of Relationship:** Promote the development of area Veterans and members of the western Massachusetts military community, and create a skilled and diverse workforce at MGM Springfield



## **WESTOVER JOB CORPS**

Located in Chicopee, MA, Westover Job Corps is a no-cost education and career technical training program administered by the U.S. Department of Labor that helps young people ages 16 through 24 improve the quality of their lives through career technical and academic training

**Programs | Services:** The Job Corps program is authorized by Title I-C of the Workforce Investment Act of 1998 and has been reauthorized through WIOA. The Westover facility offers HiSET and high school diplomas in addition to training in the following trades and occupations:

- Carpentry
- Culinary Arts
- Electrical
- Office Administration
- Plumbing

**Nature of Relationship:** Training and education institution



## **CAREERPOINT**

A partnership with Holyoke Community College

**Programs | Services:** Provide essential skills training to MGM Springfield candidates, pre-screen candidates for employment, partner in select MGM Springfield career events, particularly those in Holyoke

**Nature of Relationship:** Promote the development of a skilled and diverse workforce with access to a well-qualified and robust talent pool from Holyoke



## **COMMUNITY ENTERPRISES**

Community Enterprises is a nonprofit in the area of Workforce Development. They help companies hire and retain qualified staff by connecting pre-screened applicants for direct hire or helping businesses to develop small groups sites.

**Programs | Services:** Develop Job Training and Placement Programs (JTTPs). JTTPs provide on-site, customized vocational training to workers with disabilities. These include soft skills training, Workforce Readiness Training, interview preparation and travel training.

**Nature of Relationship:** Workforce Development and Training

# ADDITIONAL COMMUNITY PARTNERS





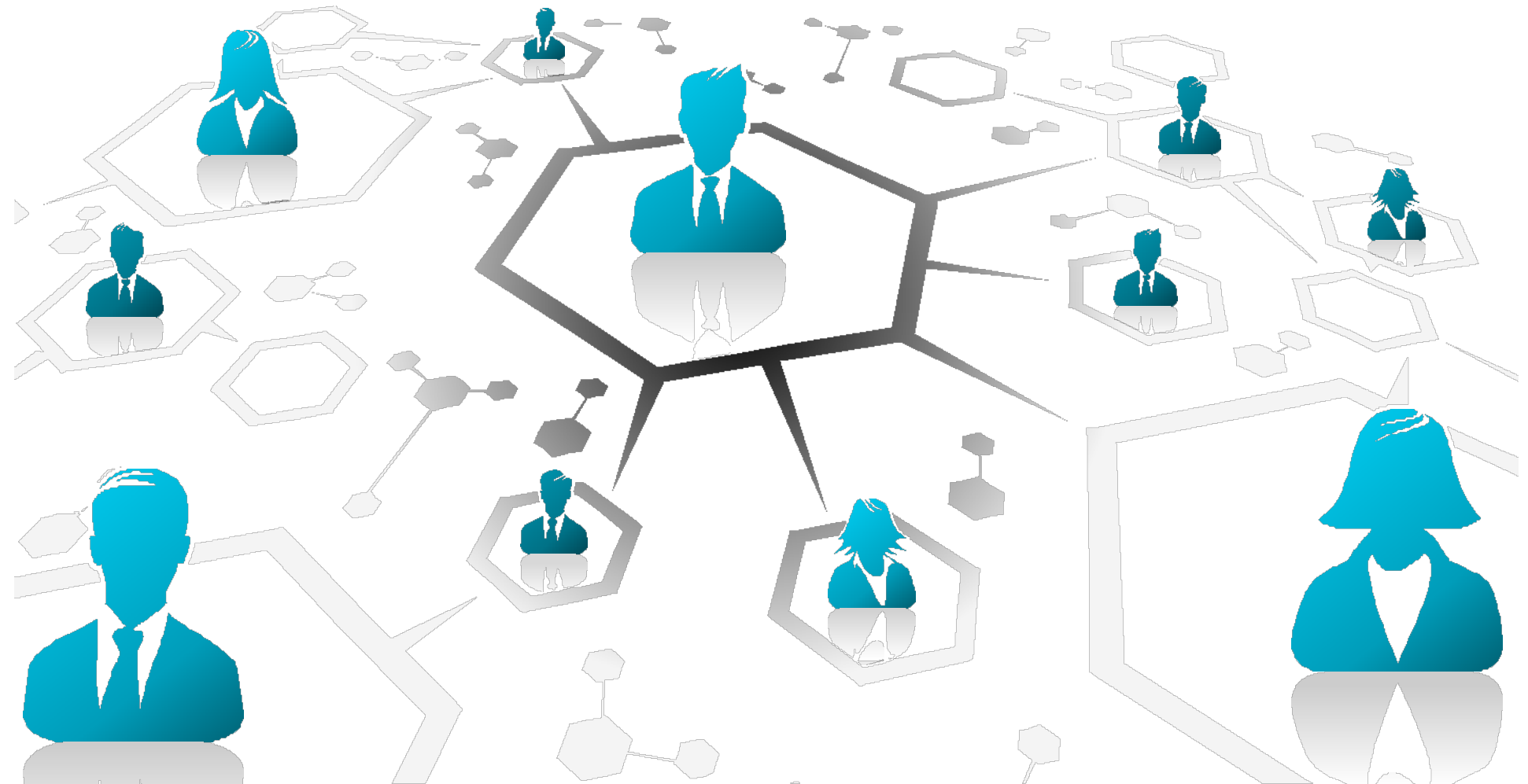
## OVERVIEW

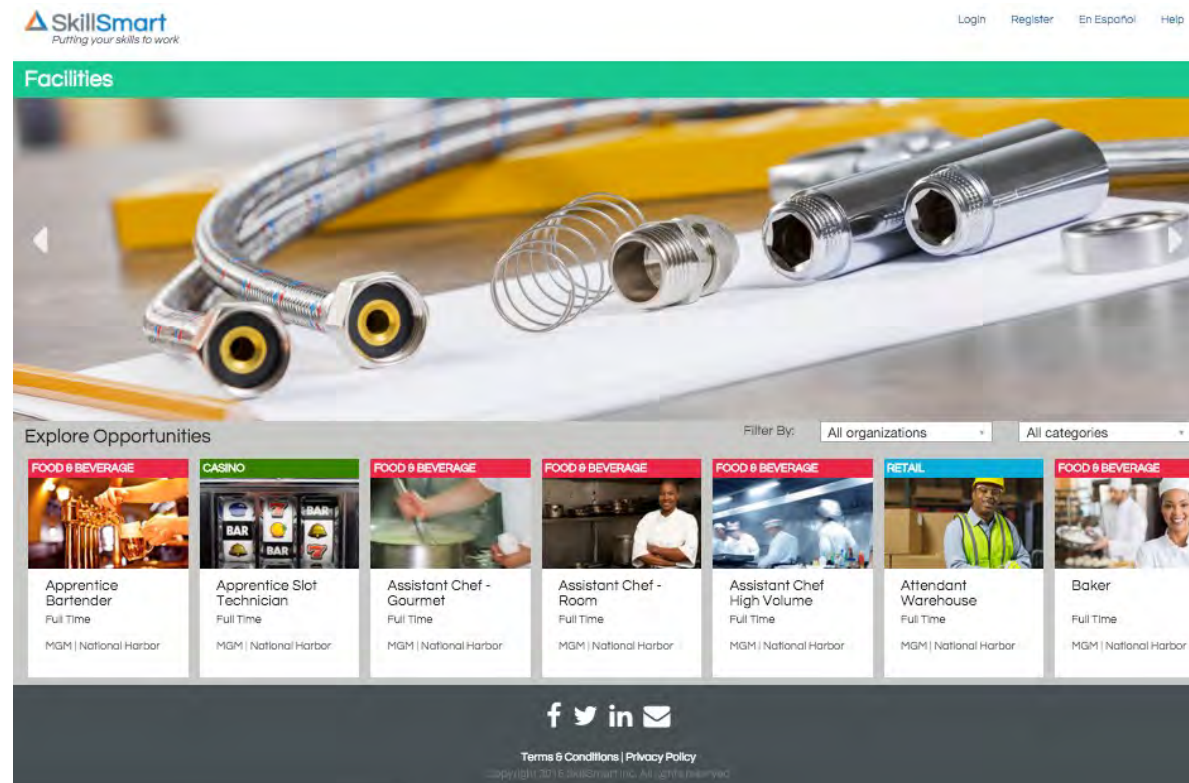
SkillSmart is a skills-based platform connecting the right talent to the right job. It transforms the interaction between employers and job seekers digitally, by working with employers to define the exact skills needed for success—and then matching those skills requirements with the best candidates. SkillSmart uses skills to empower individuals and employers to maximize their potential. Their process is anchored in understanding the skills that employers need. The system provides a platform where the skills needed for success in the workplace are readily identifiable. They increase transparency in the career development and job search process, enabling a market-oriented and demand-driven approach to hiring, education and training.

Together, these components make SkillSmart the smart way to finding the right fit, whether you're an employer, a job seeker or an educator.

MGM Springfield has joined with SkillSmart to help interested parties identify possible job types that might fit their skill sets and to identify training opportunities that might be of interest. In addition, SkillSmart will notify individuals who have built a skills profile within the system, of current MGM Springfield positions available.

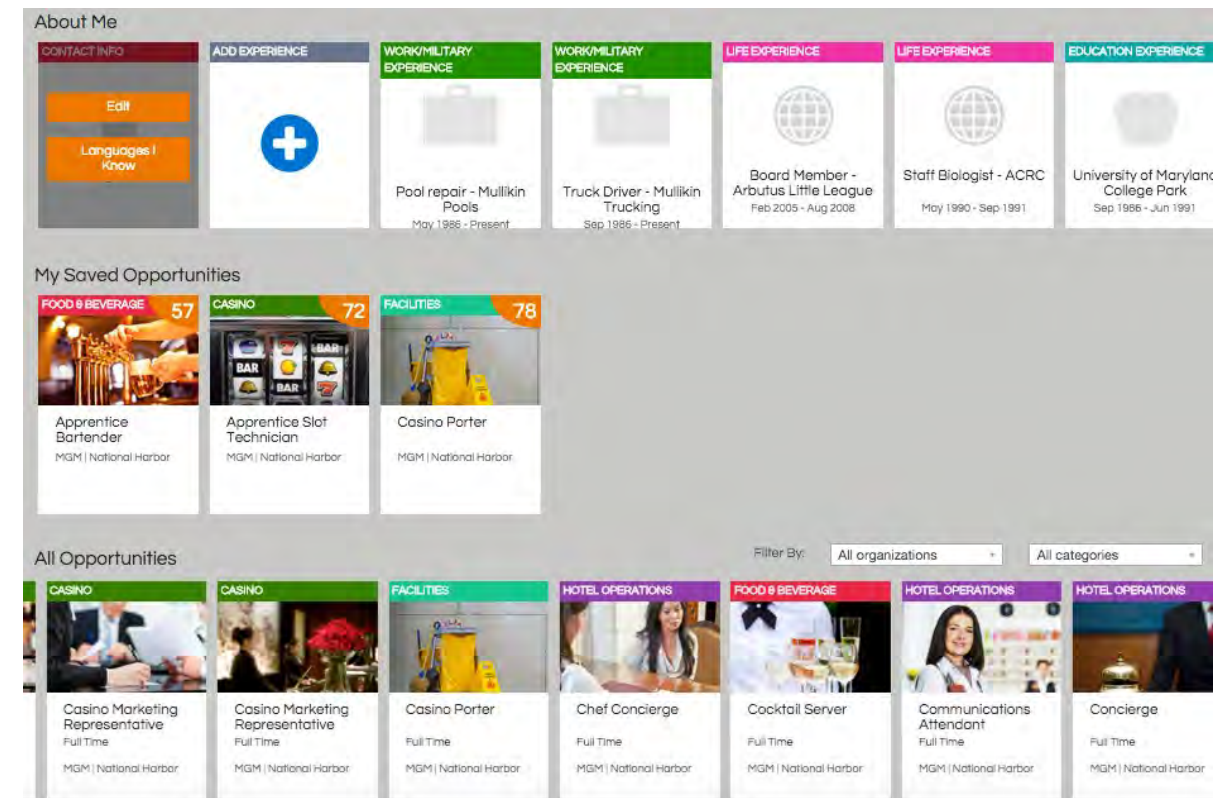
In cooperation with SkillSmart, MGM Springfield launched [MGMSpringfieldcareerlaunch.com](http://MGMSpringfieldcareerlaunch.com) as our main skills-based platform for the property.





## Landing Page

- Explore positions
- Register
- Convert to Spanish



## User profile & 'Saved Ops'

- Input experiences
- Save op & receive a score
- Alert for prerequisites
- Explore opportunities
- Add language skills
- Add personal information



**Day in the Life videos**

**Prerequisites 5 of 5**

- ✓ Flexible Schedule
- ✓ High School Diploma or G.E.D.
- ✓ Maryland Gaming / Non-GamL.
- ✓ Minimum Age: 21
- ✓ Professional Appearance

**Required Skills**

- Basic Mechanical Aptl..
- Clean Work Area
- ✗ Cleaning Supplies a...
- ✗ Comply with Compa...
- Effective Communicat...
- ✗ Guest Service Orien...
- ✗ Inventory
- Plan and Prioritize Work
- Resolve Guest Challen...
- Safely Handle Biohaz...
- ✗ Safety Orientation
- ✗ Teamwork

**Skills Score** 78

### Casino Porter

MGM - National Harbor

It is the responsibility of the Casino Porter to provide excellent guest service and create a safe and friendly environment for guests while establishing and maintaining the cleanliness of assigned areas in the Casino and public areas. All duties are to be performed in accordance with federal, state, local laws, regulations, and ordinances, as well as department and Company policies, practices, and procedures.

**Prerequisite** **NEXT**

✓ **Flexible Schedule**

MGM Resorts is open 24 hours a day, every day of the year. You will be required to work some holidays, weekends or evenings.

I understand and I meet these requirements.

**Desired & Required Skills**

The screenshot displays a user's skill profile for 'Guest Service Orientation' with a score of 78. On the left, a list of 'Required Skills' includes 'Basic Mechanical Apt...', 'Clean Work Area', 'Cleaning Supplies a...', 'Comply with Compa...', 'Effective Communicat...', 'Guest Service Orien...', 'Inventory', 'Plan and Prioritize Work', 'Resolve Guest Challen...', 'Safely Handle Biohaz...', 'Safety Orientation', and 'Teamwork'. The main profile section includes a description of the skill, followed by 'Work/Military Experience' (with an example of 'Line Cook - Chi Chi's' on a 'Daily' basis), 'Life Experience', 'Education Experience', and a 'Build my Skills' section with links to 'Hotel And Resort Operations I' and 'Catering and Banquet Planning'.

Skills are validated by experiences...

- Work
- Military
- Life
- Education Courses
- Certifications
- Diplomas & Degrees

Factors for the algorithm are:

- How long ago was it?
- How long you did it?
- How often you did it?

Education & training from local and online providers is provided when & where available.



**APPLICANT**

**j dill**  
 johndill@gmail.com  
 234-555-1212

**APPLYING FOR**

**Casino Porter**  
 MGM National Harbor

**Prerequisites**

- ✓ Flexible Schedule
- ✓ High School Diploma or GED
- ✓ Maryland Gaming / Non-Gaming License
- ✓ Minimum Age 21
- ✓ Professional Appearance

**Experience**

- Porter - Mullin Foods  
5/1998 - Present
- Truck Driver - Mullin Trucking  
8/1982 - Present
- Inventory Manager - Abacus Wine Boutique  
2/2005 - 8/2008
- Shift Manager - KFC  
5/1990 - 8/1991
- Academy Home Safety - University of Maryland  
College Park  
8/1985 - 8/1991
- Live Care - CHOP  
8/1987 - 8/1991
- Contractor - John Deere LTD  
8/1982 - 12/1989

**Required Skills**

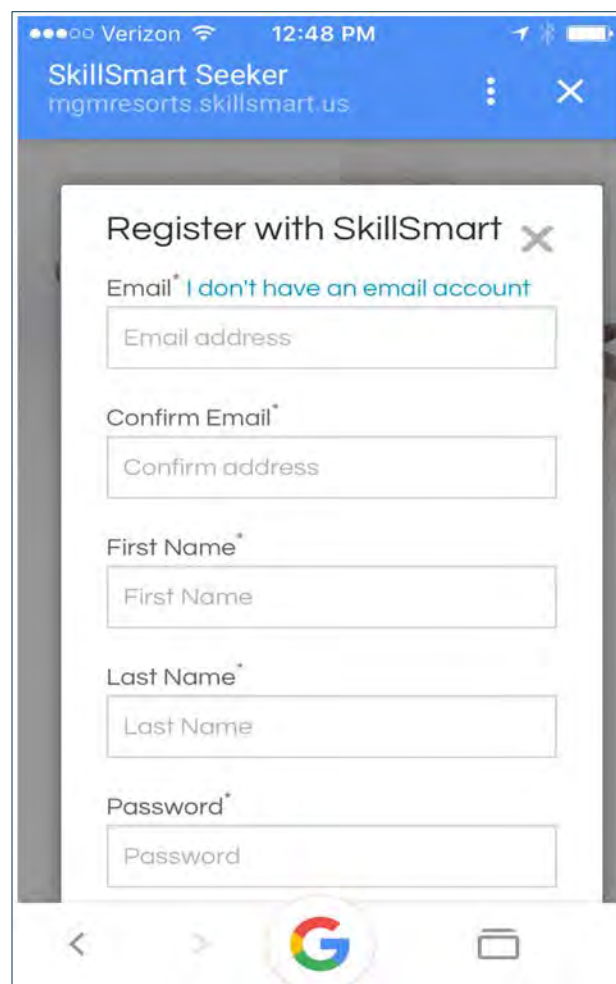
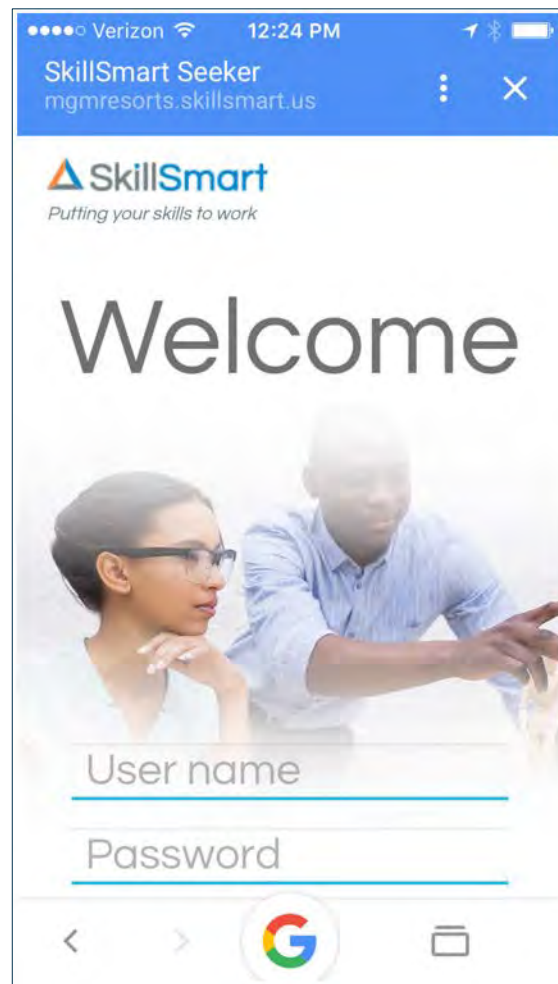
Required Skills	SI	SI	SI	SI	SI	SI
Basic Mechanical Aptitude	✓					
Clean Work Area	✓					
Cleaning Supplies and Chemicals	✓					
Comply with Company Policies		✓		✓		
Effective Communication	✓					
Guest Service Orientation						
Inventory	✓					
Plan and Prioritize Work	✓					
Resolve Guest Challenges	✓		✓			
Safely Handle Hazards						
Safety Orientation			✓	✓		
Teamwork						✓

**References**

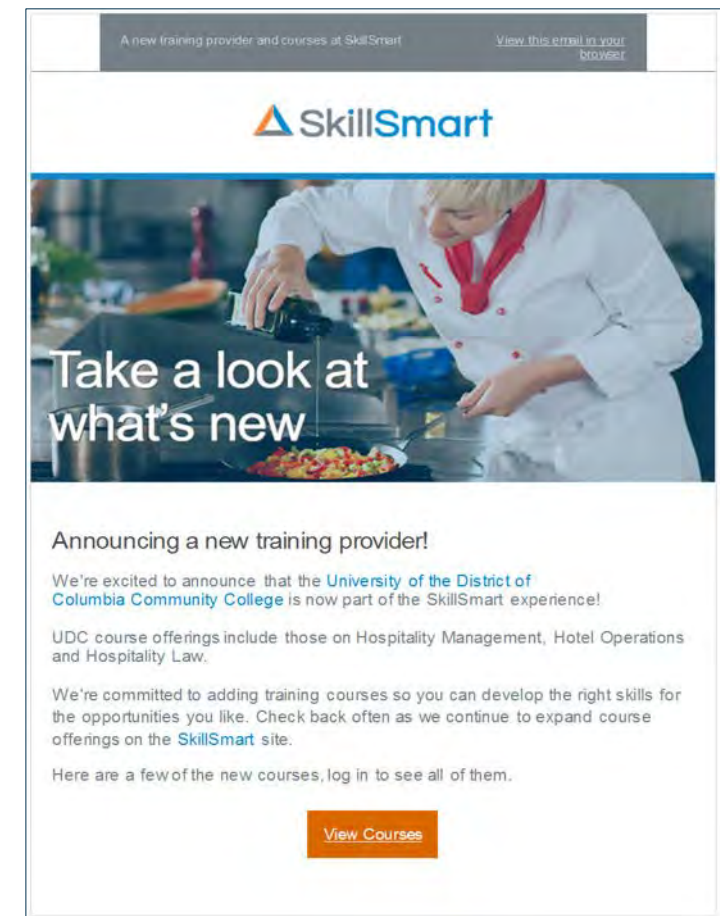
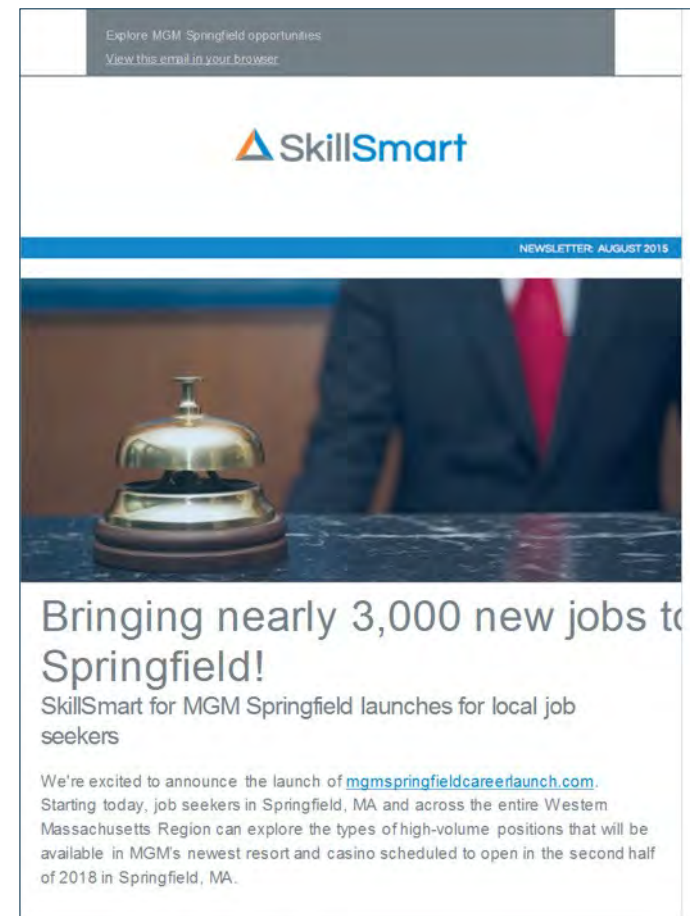
RI: Rose Mullin Aunt 333-469-0800 rm@gmail.com	RI: Rose Mullin Uncle 222-323-5555 ml@gmail.com	RI: Jeff Smith President 222-111-4444 jsmith@abag	RI: Lisa Francis Sr Director 222-333-5555 lfrancis@son.org
RI: Mike Smith GM 555-123-1212 msmith@mac.com	RI: Wade Dillow Owner 333-444-5555 wd@d.com		

**IN A QUICK OVERVIEW, ONE CAN SEE:**

- Candidate contact info
- Military experience specific to a job
- Prerequisites met
- Skills met and at what level
- Skill validation type
- References



**Mobile Ready**



**E-Notifications**





# RECRUITMENT STRATEGY





## OVERVIEW

First and foremost, MGM Resorts has been the pioneer in diversity and inclusion in the gaming and hospitality industry since our voluntary adoption of our Diversity Initiative in 2000. MGM Resorts regards diversity as an essential business paradigm for success in the modern global economy. Hence, Diversity and Inclusion are the foundation of our culture of Integrity, Teamwork and Excellence. We have systematically incorporated diversity into our Company's value system, our organizational culture and our business operations, not as a matter of legal or governmental compulsion, but as a matter of progressive business policy.

We hire and maintain a diverse, multiracial and multicultural workforce which is reflective of our host communities and our customer base. We cultivate respect for the humanity and contributions of every individual employee because our employees are our lifeblood. We realize that, to achieve the highest level of performance of our teams, and to deliver genuinely superior service to our guests, we must motivate each employee to perform at their highest levels each and every day. We, therefore, foster an inclusive culture of excellence enterprise-wide aligned with our business mission – organized around universal employee engagement, individual responsibility, individual empowerment to express diverse opinions and perspectives, inspired leadership, consistent peak performance, team collaboration, innovation, accountability and, above all, positive recognition for a job well done. Diversity and Inclusion promote greater unity in our Company around a shared common vision in achieving our business mission. MGM Springfield will advance this business model and work culture.

## DIVERSITY IN EMPLOYMENT AT MGM RESORTS

MGM Resorts is a majority minority company. In 2012, the enterprise-wide diversity profile of MGM Resorts was:

- Percentage of minority employees: 63.65%
- Percentage of women employees: 50.30%
- Percentage of minority managers: 38.17% of total 4,197 managers
- Percentage of women managers: 42.89%

MGM Resorts has maintained an over 30% representation of minorities in management and over 40% representation of women in management for the last five years. As a market leader in Diversity and Inclusion, in April 2013, MGM Resorts earned the No. 1 ranking on the "Top 10 Regional Companies" list compiled by DiversityInc, one of the nation's leading sources on diversity management. Additionally, DiversityInc recognized MGM Resorts as No. 8 on the "Top 10 Companies for Latinos." (DiversityInc's 300-field annual survey is divided into four equally weighted areas: CEO Commitment, Human Capital, Corporate and Organizational Communications and Supplier Diversity.)

MGM Springfield is committed to creating a workforce that is reflective of the local community and the region. MGM Springfield will employ many strategies to attract and retain diverse employment segments including minorities, women, Veterans and persons with disabilities. MGM Springfield will embrace equal employment opportunity,

Reasonable efforts will be made to make employment promotional and application materials available in Spanish as well as English.

## DIVERSITY GOALS DURING OPERATIONS

Pursuant to Exhibit C of the Host Community Agreement, beginning on the Operations Commencement and continuing throughout the Term:

MGM Springfield shall use its best efforts to strive to achieve labor participation goals for the utilization of City Residents so that: (a) no fewer than 35% of persons employed by MGM Springfield at the Project and any related facility will be City Residents; and (b) no more than 10% of its workforce will be residents from outside the region.

MGM Springfield shall use its best efforts to strive to achieve labor participation goals for the utilization of minority persons, women and Veterans so that: (a) no less than 50% of its workforce will be minority persons; (b) no less than 50% of its workforce will be women; and (c) no less than 2% of its workforce will be Veterans. These participation goals shall not be construed as quotas or set asides; rather, such participation goals will be used to measure the progress of MGM Springfield's equal opportunity, nondiscrimination and affirmative action program.

Please note that since signing the Community Host Agreement, MGM Springfield has held additional meetings with various Massachusetts Veteran advocacy and services groups, and believes that, with the assistance of such groups, we can increase our operations and procurement Veterans goal from 2% to 4%.





MGM Springfield will provide access to employment opportunities for the Project through a number of avenues including:

- Advertising through broadcast
- Print and social media
- Actively recruiting through Springfield community organizations
- Conducting community-based job fairs
- Promotions through regional employment boards
- Online application process

In addition, MGM Springfield will open an employment center approximately 12 months prior to the resort's opening. This employment center will serve as a one-stop location for applicants. Open positions will be posted along with job descriptions, including any certification requirements.

The employment center will be staffed by MGM Resorts Recruiters, assisted by our employment partners in the community (including FutureWorks, CareerPOINT, BerkshireWorks, staffing agencies and regional employment boards), to answer questions from applicants and assist them in finding training opportunities and employment preparation. Bilingual assistance will be available. The employment center will serve as an ongoing career fair/showcase, allowing potential applicants to receive employment assistance and coaching.

All positions will be posted on the MGM Springfield website. All open positions also will be sent to all of the regional employment partners, community-based organizations, colleges and universities, technical and vocational schools and staffing agencies for assistance in recruiting for these open positions. Priority interviewing will be given to applicants that come from our community employment partners and local educational institutions. Priority will be given to residents of the local community as well as the Western Massachusetts region in order to meet hiring commitments referred to above.

Applicants will be able to apply online and complete the online application and screening assessment at the employment center or by going on the Company's website from any (Internet-based) technology. Behavioral-based interviews will be used to ensure a fair and consistent process. After interviews are conducted during pre-opening hiring, drug testing will be completed on site by the approved provider.

Online background check paperwork will be completed along with any other licensing or certifications as required by the MGC or the Commonwealth of Massachusetts.

MGM Springfield will work to ensure that all processes that can be staffed and accommodated at the employment center will be done to ensure an efficient and convenient process for applicants.



# RECRUITMENT STRATEGY

In order to meet our HCA requirements, we have developed a plan to include:

- Community outreach through career showcases and informational sessions (i.e. hospitality/gaming)
- Internal and external communications
- Advertising and social media



CAREER FAIRS



WEBSITE / SOCIAL MEDIA



FORUMS / JOB READINESS SESSIONS



ADVERTISING



CAREER CENTER



COMMUNITY

**GENERAL RECRUITMENT**

- Finalize Employee Forecast
- SkillSmart (MGMSpringfieldcareerlaunch.com)
- Mass Hiring

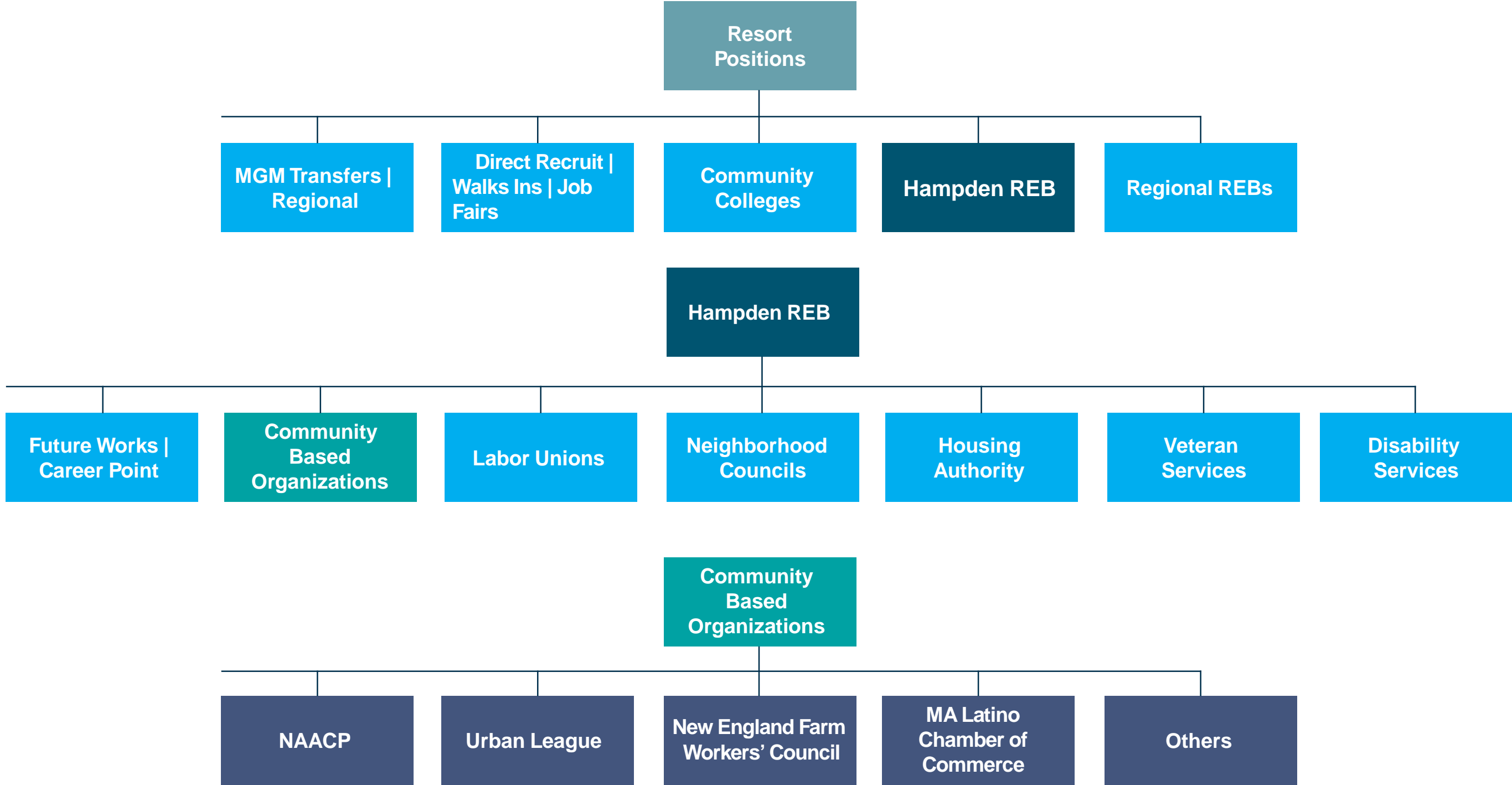
**MANAGEMENT TEAM RECRUITMENT**

- Timeline
- Candidate Pools
- Outreach Initiatives
- Key Partners





# SOURCING STRATEGY





## **OVERVIEW**

All MGM Resorts properties have industry-leading hiring and training practices that promote the development of a skilled and diverse workforce. MGM Resorts offers numerous programs within our portfolio of properties to enable employees to gain the technical skills and leadership skills to grow their careers. MGM Springfield will offer the following means for its employees to advance their careers.

## **TRANSPARENT CAREER PATHS**

At MGM Springfield, just like at all MGM Resorts properties, we will strive to showcase clear career paths so incoming employees can see from the beginning how their career can progress and what experience and skills they need to be promoted and grow in their career. Typical positions in a resort environment include roles in gaming, hotel operations and food and beverage. We have outlined some clear career paths that an entry-level employee could take in order to progress in their career.







Massachusetts Casino Career  
Training Institute

## ***MGM SPRINGFIELD | MCCTI GAMING SCHOOL***

MGM Springfield in cross-collaboration with the Massachusetts Casino Career Training Institute (MCCTI) will run the MGM Springfield Gaming School slated to open in January 2018.

The following training programs will be offered within the school:

- Blackjack Dealer
- Poker Dealer
- Surveillance
- Cage Count
- Floor Supervisor





## **TABLE GAMES CAREER PATH**

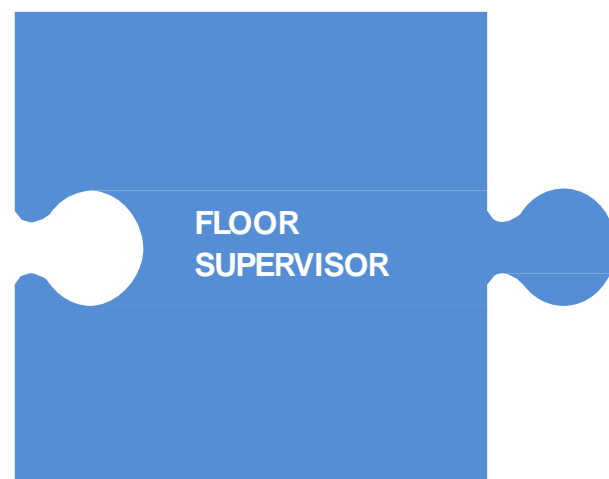
- Typically, a Table Games employee will start as a Dealer after attending a Dealer's training course. MGM Springfield is committed to working with Massachusetts Casino Careers Training Institute (MCCTI) to make available training courses that will prepare applicants to be qualified for gaming positions at MGM Springfield.
- After two to five years as a Table Games Dealer, the next step is to go to a Floor Supervisor position, where the employee would also spend two to five years gaining experience watching and monitoring the game.
- The next step is to work as a Pit Manager/Back-Up Assistant Shift Manager, again for another two to five years. This helps gain experience monitoring several casino pits at one time.
- After this step the employee can move to an Assistant Shift Manager, then Shift Manager. Both positions require supervising an entire shift of Table Games employees and would require approximately two to five years of experience at this level.
- The next step is a Director of Table Games, who is responsible for the leadership of all Table Games employees, and if available, they can move to a Vice President of Table Games position after another two to five years. Generally, larger properties have a Vice President whereas smaller properties stay with a Director of Table Games.



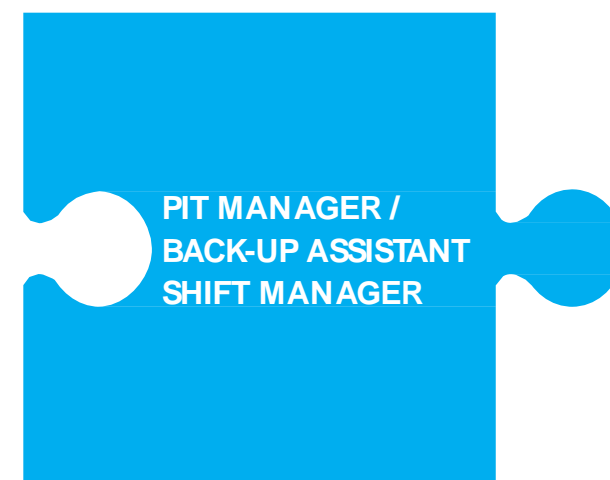
# TABLE GAMES CAREER PATH



Typically, start as a Dealer after attending a Dealer's training course



After 2-5 years, the next step is to go to a Floor Supervisor, gaining experience watching/monitoring the game



Pit Manager/Back-Up Assistant Shift Manager, again 2-5 years; gaining experience monitoring several casino pits at one time



Requires supervising an entire shift of Table Games employees and would require 2-5 years of experience





## **CULINARY CAREER PATH**

- A traditional career path in the culinary industry begins with a Cook position. MGM Springfield would work with local educational institutions, including Holyoke Community College, to make available culinary training and educational opportunities that would provide sufficient training to qualify a student to obtain a Cook's position at MGM Springfield upon completion.
- After serving approximately five years as a Cook, employees can move to the Master Cook position and after another two years they would qualify to be promoted to Sous Chef.
- Assistant Room Chef is next, which is the position of right hand to the Executive Room Chef. This position typically lasts three years.
- Executive Room Chef follows, with another three years of experience running a kitchen in a particular restaurant or outlet.
- This experience qualifies the employee to work as an Assistant Executive Chef, who helps in leading several restaurants and the culinary aspects of an entire food and beverage operation at a resort.
- After three to five years as an Assistant Executive Chef, this person would then be qualified to serve as an Executive Chef over all culinary operations at the resort level.



## ***HOTEL OPERATIONS CAREER PATH***

- To start a career in Hotel Operations as a Front Desk Agent, applicants would need to have guest service and cash handling skills. MGM Springfield will be working with local educational institutions to provide basic skills training to prepare applicants for entry-level positions such as this. Particular software knowledge can be taught on the job. This position would last for two to three years.
- The next step would be to move to Relief Administrative Assistant, Lobby Ambassador or Relief Rooms Coordinator. All of these positions require customer service experience and the ability to resolve guest and employee issues, along with a deeper knowledge of Company policies. These positions would last another two years or more. At this point the employee should start acquiring supervisory skills and developing their ability to lead people and teams.
- Moving to a Relief Assistant Front Desk Manager or Assistant Front Desk Manager is next. This requires the employee to take on a leadership role and learn to manage people, shifts and hotel inventory. The employee also would be required to resolve major guest concerns and make financial decisions.
- In order to become a Director of Front Office, employees need to acquire leadership experience in other areas of Hotel Operations. For example, Assistant Front Desk Managers could move to Executive Housekeeper positions, where they would learn that aspect of the business and hone their leadership skills. Other positions that would provide leadership experience might include Executive Meetings Manager and Guest Relations.
- After approximately one to two years working in these areas, the employee would be ready to take on the Director of Front Office position, which could lead to Director and VP of Hotel Operations positions.







# HIRING PLAN





# HIRING PLAN



## Join our talented team

MGM Springfield will bring a host of career opportunities, from entry level, to management positions, with the majority of those jobs going to local residents from in and around the City of Springfield and the Region.

To bring our resort to life, we're going to need front desk agents, restaurant managers, table games dealers, engineers, food servers, security team members, and that's just to name a few!

And we mean careers - not just jobs. The first job you get at Springfield is not likely to be your last, because joining a team as large and diverse as MGM Resorts means exponential opportunities for promotion and advancement.

Congratulations on taking your first step towards a new career! It's not work if you love what you do!

**MGM SPRINGFIELD**  
**CAREERLAUNCH**



### Position Posted Online March to July

#### Hotel Operations

Hotel Operations Manager  
Front Desk Agent  
Hotel Revenue Manager  
PBX Operator  
Bell Supervisor  
Bell Person  
Door Person  
Valet Assistant Manager  
Housekeeping Director  
Housekeeping Floor Supervisor  
Guest Room Attendant  
Uniform Attendant  
Spa | Salon Attendant

### Position Posted Online March & August

#### Security & Surveillance

Security Shift Supervisor  
Security Officer  
Safety Manager  
Surveillance Supervisor  
Surveillance Operator  
Lost & Found Clerk

### Position Posted Online April to August

#### Table Games

Casino Shift Manager  
Table Games Pit Manager  
Floor Supervisor  
Dealers  
Cage Cashier | Shift Supervisor  
Pit Clerk  
Casino Credit Clerk  
Pit Clerk  
Count Team Supervisor  
Count Team Member

### Position Posted Online April to August

#### General & Administrative

HR Business Partner  
Carpenter / Painter  
Facilities Supervisor  
Casino Porter  
Utility Porter  
Events | Communications Partner

*Please note that this is not a complete list of positions that will be available at MGM Springfield. Positions may vary depending on need.*

### Position Posted Online March to July

#### Food & Beverage

Pastry Chef  
Sous Chef  
Head Butcher/Butcher Steward  
Restaurant General Manager  
Host Person  
Food Server  
Cook/Cook's Helper  
Pantry Person / Kitchen Worker  
Beverage Manager  
Bartender / Bar back  
Cocktail Server  
Convention Services  
Cashier  
National Sales Manager  
Manager | Coordinator Sales

### Position Posted Online May to August

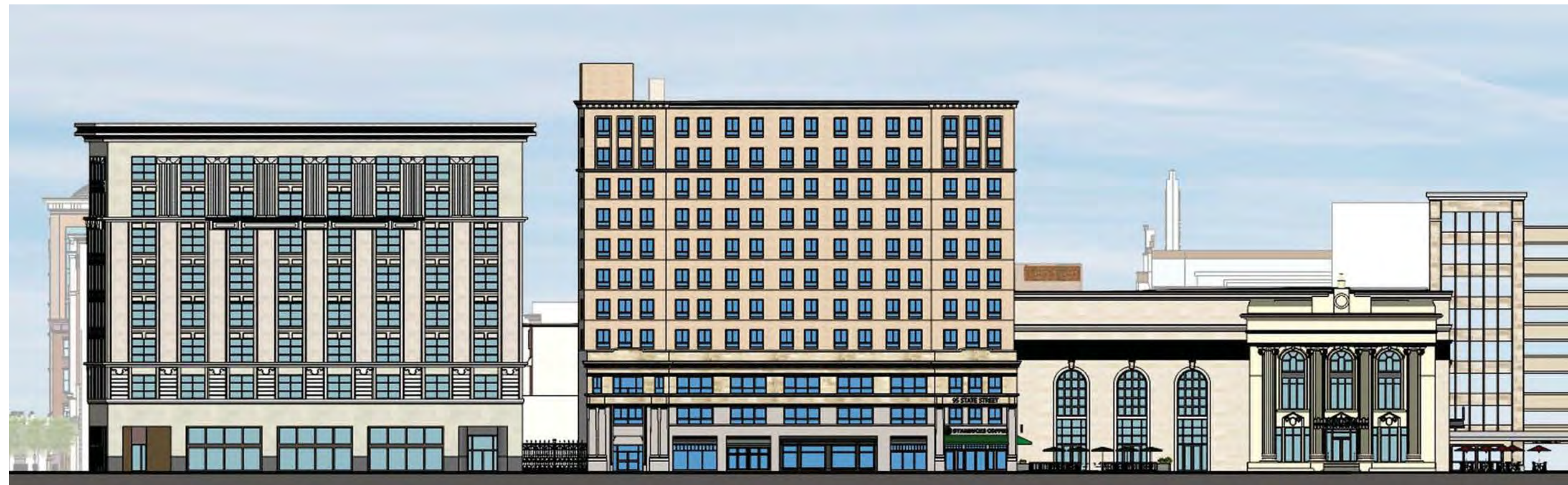
#### Slot Operations

Slots Shift Manager  
Slots Assistant Shift Manager  
Slots Guest Services Representatives  
Lead Slot Technician



MGM Springfield will attract and retain high-quality employees. Our team will be working diligently to hire thousands of employees before our projected opening date of September 2018.

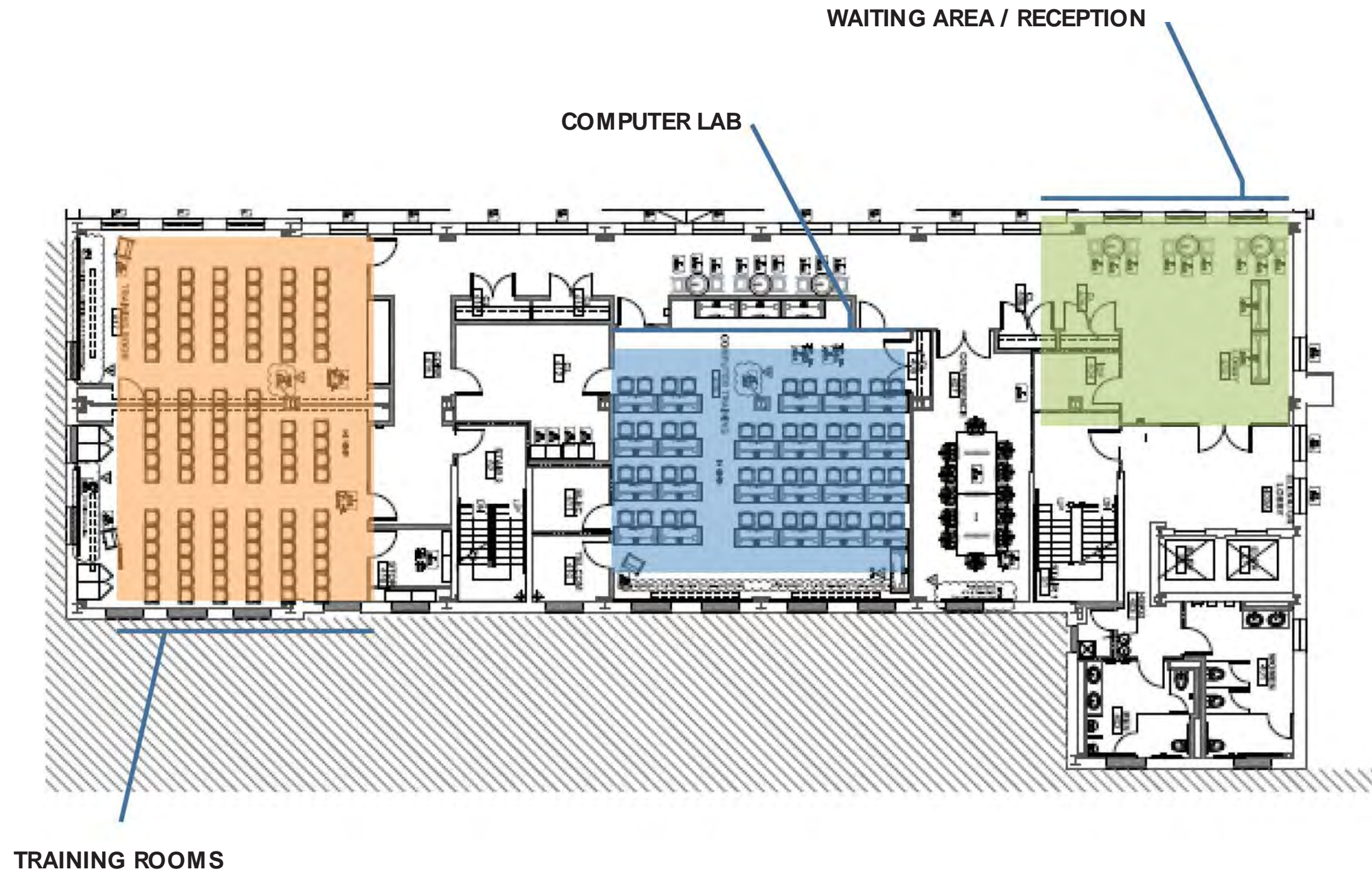
## ***MGM SPRINGFIELD EMPLOYMENT CENTER***



The MGM Springfield Employment Center will open in Q1 2018. The MGM Springfield Employment Center will be the hub for interviewing candidates and processing new MGM Springfield employees. In addition, computer resources will be available during predetermined time frames and Employment Representatives will be on hand to provide application support.



# MGM SPRINGFIELD EMPLOYMENT CENTER





# MGM SPRINGFIELD HUMAN RESOURCES







## Ready to apply?

Check out our current available or career opportunities at [mgmresortscareers.com](http://mgmresortscareers.com)  
Click on **Search All Jobs**  
Browse through our **Popular Jobs**.

### I applied. What happens next?

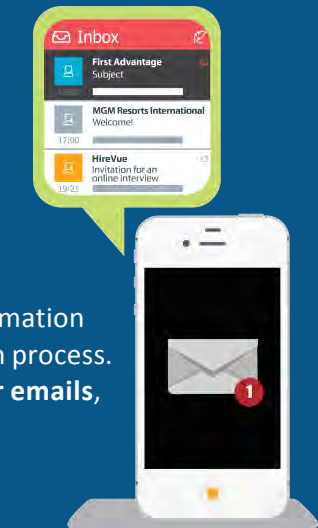
#### 1 Application submitted.

Thank you for your interest! We have received your application and are reviewing your experience and qualifications.



#### 2 Check your inbox.

Please check your email for information on the next steps in the selection process. **If you did not receive any of our emails**, please check your spam folder.



#### 3 Depending on the position you applied to, you may or may not:



Get an online assessment from **APT Metrics**.

or



Get invited to take a video interview from **HireVue**.

or



Receive a phone call to discuss the position and be invited for a face-to-face interview.

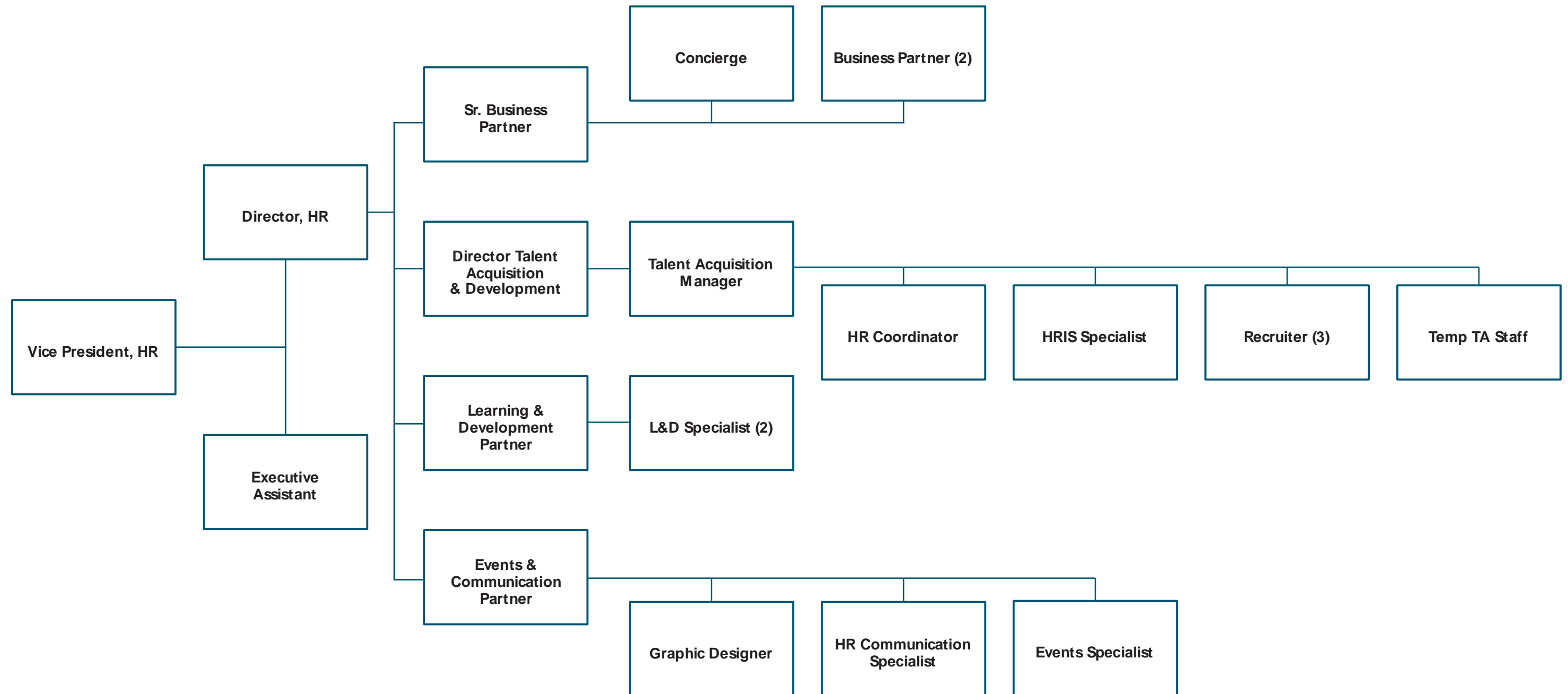
### Not sure what's happening with your application?

Log in to your account at [mgmresortscareers.com](http://mgmresortscareers.com). Click on **Search All Jobs** and sign in to check your status.

**Sign In**



# HUMAN RESOURCES ORGANIZATION CHART







# TRAINING PLAN





## ***THE STRATEGY***

Based on hiring and onboarding timelines, an overall training plan strategy will be developed with a subsequent timeline.

Three distinct stages will be developed and implemented for MGM Springfield; they include:

Stage 1 | Evaluate Training Needs

Stage 2 | Development

Stage 3 | Delivery







## STAGE 1 / EVALUATE TRAINING NEEDS

- Select a Training Program
- Identify Additional Courses for Workforce Skill Gaps
- Consult with Property Leaders on Department Needs and Expectations
- Outline Training Space & Logistics

## STAGE 2 / DEVELOPMENT

- Train-the-Trainer
- Train-the-Trainer Sessions for Supervisor+
- Integrate Guest Service Standards and Property Branding
- New Leader Onboarding
- Update New Hire Orientation
- Train HR Task Force Team
- Train Property Tour Ambassadors

## STAGE 3 / DELIVERY

- Launch New Leader Onboarding Training for Supervisor+
- Launch Updated New Hire Orientation
- Coordinate Property Tours
- Deploy HR Task Force Team

# TRAINING PLAN TRACKING



TASK	DESCRIPTION	OWNER(S)	DATE TO COMPLETE
Finalize Department Training	<ul style="list-style-type: none"> <li>Each department will finalize Foundations SOPs and be trained how to use the SOPs to maintain property and guest service standards</li> <li>Departments to complete their SOPs to use as employees are onboarded</li> </ul>	HR L&D Division Training Managers	TBD
Curriculum Development	<ul style="list-style-type: none"> <li>Create an updated New Hire Orientation class PowerPoint, Facilitator Guide and Participant Guide (two-day curriculum)</li> <li>Create a three-day New Leader Onboarding for all Supervisors+. This includes PowerPoints, Facilitator Guides and Participant Guides</li> </ul>	HR L&D MGM Resorts University	TBD
Guest Service	<ul style="list-style-type: none"> <li>Incorporate into all HR trainings (NHO, NLO, etc.)</li> <li>New Hire Orientation will review: Luxury Service, Verbiage, Professional Appearance, Service Recovery, GEM/TripAdvisor/Internal Shops, Creating Memorable Experiences</li> </ul>	MGMRI HR L&D	TBD
Countdown Training Calendars	<ul style="list-style-type: none"> <li>Collect plans from departments to identify all department trainings and re-evaluate possible financial savings with onboarding dates in Training Matrix Spreadsheet</li> <li>Account for vendors, equipment, spacing and trainers</li> </ul>	HR L&D DTMs Departments	TBD
Logistics Plan	<ul style="list-style-type: none"> <li>Intake requests for training space from departments</li> <li>Evaluate training space on property and assist departments with special requests (if possible)</li> </ul>	HR L&D	TBD
Task Force Members	<ul style="list-style-type: none"> <li>Schedule training for all Members in Las Vegas prior to arriving at MGM Springfield</li> <li>Deploy HR Task Force Team beginning late June through Opening to assist with NHO and NLO</li> </ul>	HR L&D	TBD
Property Tours	<ul style="list-style-type: none"> <li>HR will coordinate times and groups to tour the FOH and BOH areas</li> </ul>	HR L&D Marketing Hotel Sales	TBD
Pep Rally	<ul style="list-style-type: none"> <li>Within one – two weeks prior to Opening, we will come together as One Game-Changing team to build excitement, energy and pride</li> <li>This will include our Property Leaders and possible entertainment for one hour</li> </ul>	HR Events & Communications Marketing	TBD



# TRAINING PLAN TIMELINE

	STAGE 1: EVALUATE TRAINING NEEDS			STAGE 2: DEVELOPMENT				STAGE 3: DELIVERY			
	NOVEMBER	DECEMBER	JANUARY	FEBRUARY	MARCH	APRIL	MAY	JUNE	JULY	AUGUST	
Department Training	SELECT TRAINING METHOD		UPDATE SOPS	DEPARTMENT SOP UPDATE COMPLETE			LAUNCH TTT (SUPV+)		TRAIN HR TASK FORCE FACILITATORS		
New Hire Orientation	IDENTIFY WORKFORCE SKILLS GAPS		BUILD ORIENTATION CURRICULUM			IMPLEMENT TRAINING		TRAIN HR TASK FORCE FACILITATORS	MULTIPLE CLASSES / WEEK		
New Leader Onboarding		IDENTIFY CONTENT TOPICS		BUILD WORKSHOP CURRICULUM		LAUNCH SUPV+					
Task Force (Divisional & HR)	LAUNCH SELECTION PROCESS		FINALIZE LIST						DEPLOY FACILITATORS		
Logistics		OUTREACH TO CBOS		RESERVE SPACE					USE PROPERTY TRAINING ROOMS, BALLROOM		

# TRAINING PRACTICES



MGM Springfield is committed to providing a training curriculum and an employee relations plan that will set the standard in the hospitality and gaming industry. These elements will set the foundation for the success of our employees and establish a competitive edge in the industry. Best practices from existing MGM Resorts properties in Las Vegas, Michigan, Maryland and Mississippi will be the basis for development of these training activities.

The training and development goals of MGM Springfield will be to provide learning experiences that contribute to the overall goals of the Company, to enable employees to function successfully in their positions and to prepare employees to advance within the Company.

MGM Springfield will partner with the Massachusetts Casino Careers Training Institute and other local educational institutions to develop and implement training programs for employees and individuals seeking employment with MGM Springfield. Our industry-leading training will be designed to provide learning in several phases:

- Pre-Employment
- Post-Employment
- Ongoing Training
- Career Development





# KEY HIRES 2017







The following key hires will occur in 2017 (not inclusive):

- VP Facility
- VP Human Resources
- Director Talent Acquisition
- VP Food & Beverage
- VP National Marketing
- Director Compliance
- VP Slot Operations
- VP Table Games
- Executive Director Security
- Executive Director Hotel





# MASTER TIMELINE





# MASTER TIMELINE



	March '17	April '17	May '17	June '17	July '17	August '17	September '17	October '17	November '17	December '17	January '18	February '18	March '18	April '18	May '18	June '18	July '18	August '18	September '18	
	18	17	16	15	14	13	12	11	10	9	8	7	6	5	4	3	2	1	0	
<b>Management Recruitment</b>	Active	Active	Active	Active	Active	Active	Active													
<b>Workforce Development</b>	Active	Active	Active	Active	Active	Active	Active	Active	Active	Active	Active	Active	Active	Active	Active	Active	Active	Active	Active	Active
<b>Internal Communication</b>				Active	Active	Active	Active	Active	Active	Active	Active	Active	Active	Active	Active	Active	Active	Active	Active	Active
<b>External Communication</b>							Active	Active	Active	Active	Active	Active	Active	Active	Active	Active	Active	Active	Active	Active
<b>Gaming School Opens</b>											Active	Active	Active	Active	Active	Active	Active	Active	Active	Active
<b>Employment Center Opens</b>											Active	Active	Active	Active	Active	Active	Active	Active	Active	Active
<b>Mass Recruitment</b>													Active	Active	Active	Active	Active	Active	Active	Active



# MASTER TIMELINE



## SUMMER 2017

MGM Resorts/ HCC Center for Hospitality and Culinary Arts at Holyoke Opens



## SPRING 2018

Mass Hiring Events



## SEPTEMBER 2018

Grand Opening



## WINTER 2017

MGM / MCCTI Gaming School Opens  
MGM Employment Center Opens



## SUMMER 2018

Job Offers



**From:** James, Jennifer (EOLWD)  
**Sent:** Wednesday, May 24, 2017 3:17 PM  
**To:** Stebbins, Bruce (MGC); Griffin, Jill (MGC)  
**Cc:** Walker II, Ronald L. (EOLWD); Doheny, Michael (EOLWD); Muradian, Jessica (EOLWD); LePage, Robert (EOE); Vega, Juan (EOHED); Sweeney, Alice (EOL)  
**Subject:** MGM Springfield Workforce Plan

Commissioner Stebbins and Jill,

On behalf of the Executive Office of Labor and Workforce Development, I reviewed the [MGM Springfield Workforce Development Plan](#) to promote job opportunities at MGM as required in the MGM License Agreement as a condition of licensing. Based upon my review, the Plan meets the requirements of Condition 15 in the Agreement directing MGM to address the following:

The provision of a plan within ninety (90) days of the Commissioner's request after the Effective Date to work with the Massachusetts Department of Labor and Workforce Development and related state and local agencies to create a plan for approval by the Commission in consultation with the Massachusetts Department of Labor and Workforce Development **to identify and market employment opportunities** to unemployed residents of Massachusetts. (The full License Agreement can be found here: <http://massgaming.com/wp-content/uploads/Agreement-to-Award-Category-1-Resort-casino-License-to-MGM-Springfield.pdf>)

EOLWD looks forward to working with MGM and the Massachusetts Gaming Commission to develop a detailed set of action steps to connect MGM with public and non-profit workforce development organizations to directly recruit and train unemployed residents in Springfield and the region to establish a consistent pipeline of qualified employees. MGM should provide further details, including processes and timelines, which specifically describes how MGM plans to meet their host community agreement employment goals of hiring 35% Springfield City residents.

EOLWD will continue to provide support to MGC and MGM on the most effective ways to partner with the public workforce system in the region to meet the hiring and training goals for the project.

Best,

Jennifer James Price  
Undersecretary for Workforce Development  
Executive Office of Labor and Workforce Development  
1 Ashburton Place, 21<sup>st</sup> Floor  
Boston, MA 02108





May 16, 2017

Massachusetts Gaming Commission  
101 Federal Street, 12th Floor  
Boston, MA 02110

Re: **Workforce Development Efforts in Region 2**

Dear Commissioners:

The following Hampden County workforce development planning information is provided at the request of MGM Springfield in order to describe our joint efforts to address the workforce demand for this new facility, meet the training requirements of the Massachusetts Gaming Commission and MGM and develop the regional partnerships necessary to meet the resulting demand of this new resort facility. This information is designed to complement the MGM Springfield Workforce Development Plan submission to the commission

In April of 2012 the Community Colleges formed the Massachusetts Casino Careers Training Institute (MCCTI) to coordinate statewide and regional workforce training programs and services and to provide education and training to Massachusetts residents for eventual placement into a variety of occupations in the new-to-Massachusetts gaming industry in order to meet the primary goal of the Massachusetts Expanded Gaming legislation, net job gain for each region. The community colleges in the Commonwealth have had a long tradition in providing workforce development services and training. The colleges regularly work in collaboration with State agencies, institutes of higher education, school districts, vocational high schools, state and local workforce development leaders, Workforce Investment Boards, Career One-Stops, community based organizations, labor unions, private training vendors and businesses to train the unemployed, underemployed and those with limited educational attainment.

In our work with MGM Springfield in the western gaming region, we have scaled up our workforce efforts which include workforce skills training, adult basic education, English for speakers of other languages, job readiness, culinary and hospitality training, customer service and student support services. In addition MCCTI will be submitting an application to the Massachusetts Gaming Commission for the development of a Gaming School in the region. These workforce development efforts are designed to scale up the size of the



region's workforce and to help individuals obtain the skills necessary to obtain employment in the gaming industry in Massachusetts. As an international entertainment company, MGM International has designed a plan to create approximately 3,000 jobs in western Massachusetts at the new MGM Springfield Resort. MGM anticipates that they will hire approximately 800 individuals in hospitality and food related occupations while needing over 600 individuals in gaming related occupations.

- **Labor Market Information:**

In the Commonwealth's Workforce and Labor Area Review of 2015 developed in October of 2016 it notes that Hampden County has a labor force 221,258 individuals with 206,291 employed with an unemployment rate of 6.8% and an average annual wage of \$47,736 and over 16,928 business establishments. This data shows a continued decline in the size of the labor force in Hampden and at the same time it demonstrates that the level of unemployment in Hampden County is higher than the statewide percentage and that the average annual wage is significantly below the statewide figure. More recent data shows that the unemployment rate in the region has improved but still lags behind the rate of the Commonwealth as a whole. In addition, the unemployment rates of the cities within the urban core of Hampden County are significantly higher than the state and the county unemployment numbers. These cities have experience chronic high levels of unemployment for decades. The growth of business establishes at 4.3 % is higher than the state growth of 3.4% - this is good news but it puts additional pressure on a declining labor force.

- **Skill Gaps**

Due to the high levels of chronic unemployment and under employment many individuals are seeking entry-level employment. With low levels of educational attainment, high levels of poverty, language challenges, limited work history and traditional obstacles to education/training and employment like transportation, and child/elder care individuals find it difficult to find employment. The skill gaps include, but are not limited to, the following:

- The lack of a high school credential;
- An absence of workplace readiness;
- Limited or no workplace skills training, i.e. job specific skills – customer service, ServSafe credential, on-the-job safety training, teamwork and communication; and,
- Basic math and English language proficiency – reading and writing skills.

In 2016 the Regional Employment Board of Hampden County reported that there are approximated 29,000 people working in food preparation and food serving occupations in the region, but at the same time there were approximately 1,700 vacancies in these same occupations. Given declining unemployment and the shrinking of the labor force in the county, increased demand for workers due to business growth and the workplace readiness challenges of those seeking employment it is obvious that a large-scale workforce development effort in the region is imperative.



A perfect storm demographic has emerged – flat population growth, limited immigration or migration into the region, an aging workforce, high unemployment, limited educational attainment and the other obstacles noted above, make it necessary that incumbent workers enhance their skills and that the available labor pool (unemployed and underemployed) make themselves ready for employment. MGM's need for over 800 individuals to fill entry level hospitality and culinary occupations will put a significant stress on the region's labor market. The Commonwealth has adjusted many of its grant programs to address this skills gap issue but new resources and continued work on this issue is required.

- **Recruitment Funnel**

MGM Springfield has identified that it desires to interview 3 trained individuals for each available position. Working backwards, we anticipate that our initial recruitment will require us to work with over 21,000 individuals or 7 persons per available position. We have applied standard training metrics to know that this requirement will eventually yield at least 3 individuals for MGM interviews. We will provide more data on this in our MCCTI presentation to the Commission

- **English Language Learners and Adult Basic Education**

Combined Holyoke Community College (HCC) and Springfield Technical Community College (STCC) are the largest regional providers of Adult Basic Education (ABE) and English for Speakers of Other Languages (ESOL) in the region through a variety of credit and non-credit programs. Although the demand for these services is at a high level and resources are limited, the two colleges are currently serving well over 400 English language learners and hundreds of others seeking a high school equivalency. In the past year, over 700 individuals earned their high school equivalency through HiSet/GED preparation classes and HiSet/GED testing. A number of other programs are also designed to increase workplace readiness and entry-level skills training. In addition, the colleges have formed collaborative networks with other regional partners to maximize the number of individuals who can be served in the region in ABE and ESOL. Over the past year, HCC through the MA Integrated Training and Education grant has developed an ESOL into training model meant to increase the number of English language learners who can become familiar with career opportunities and develop the basic skills for employment. This summer cohorts of students will begin these ESOL/Culinary classes at Putnam High School in Springfield. Resources are necessary for the colleges to continue to develop these training models and to scale them up. Career pathway models have been developed in hospitality and culinary training efforts as well as in many other industry sectors in order to increase the size of the region's labor pool.

- **Employability Skills**

All workforce development courses and most career programs at the colleges offer employability skills, including but not limited to, employer expectations, work readiness – punctuality, attendance, proper language, communication, teamwork, customer service,



work appropriate dress resume writing, interview preparation, job search, application preparation – and issues that might create obstacles to employment or challenges while on the job – transportation, child/elder care and background checks (employment history, financial and criminal).

- **Customer Service**

Customer Service training is offered through credit and non-credit programs at both colleges. STCC has developed a condensed and rigorous customer service credit certificate, which allows the individuals to take it at a number of times throughout the year. As part of the planning for the Gaming School in the region a customer service program will be part required curriculum for each participant. With the help of MGM and the Greater Springfield Convention and Visitor's Bureau it is hoped that the region can reach a high level of customer service excellence in the hospitality sector.

- **Culinary Skills**

Over the past four years, MGM has worked with Training and Workforce Options (TWO) and HCC to develop a variety of strategies to scale up the culinary and hospitality workforce. Through TWO, over 650 individuals have been trained in basic hospitality skills over the past 2-½ years and individuals have been placed in jobs at a rate of 85%. This effort to scale up the hospitality/culinary workforce will continue. It is imperative that the State and the workforce system of the Commonwealth continue to invest in workforce skills training in this field. In addition MGM and MCCTI have developed partnerships with local community based organizations, vocational schools and private trainers increase the training capacity in this sector.

It is anticipated that the new MGM HCC Culinary Institute will be completed in the fall of 2017 with workforce training programs beginning in November and credit programs beginning in January of 2018. HCC estimates that credit enrollment will double in culinary programs and that the workforce training efforts will deliver over 500 individuals annually to meet this peak demand.

- **Gaming Training**

MCCTI is presently developing an application for a Gaming School license, which will detail all of the information requirements. In the MCCTI presentation on May 25<sup>th</sup> the details of the plan will be described.



I hope this information is useful as you review the workforce development plan of MGM Springfield. If you have any questions, or if you require additional information, please feel free to contact us at your convenience.

Sincerely,



Jeffrey P. Hayden  
VP of Business and Community Services



Mr. Jeremiah P. Riordon  
Vice President of Workforce Development and Training



Springfield Technical & Holyoke Community Colleges

February 28, 2017

Massachusetts Gaming Commission  
101 Federal Street, 12th Floor  
Boston, MA, 02110

Dear Chairman and Commissioners:

It is our pleasure to write in support of our close collaboration and on-going partnership with MGM Springfield on their Workforce Development efforts and the initial presentation of their Workforce Development plan to the Massachusetts Gaming Commission on March 2, 2017. There is a desperate need for more individuals to have the basic education and core workplace skills that will make them effective employees within the entertainment industry especially Hospitality/Culinary and gaming sectors. At the same time, individuals are desirous of beginning a career pathway in this industry, as it is one of the high growth sectors within our regional economy.

We have worked with MGM Springfield for over 4 years on a number of workforce initiatives, such as the Rapid Response grant from the Department of Higher Education and the Commonwealth Corporation Workforce Competitiveness Trust Fund grant for culinary and hospitality training and have been one of MGM Springfield's main partners with the development of the Culinary program and the Gaming School; still in the works. We have jointly taken regional leadership on scaling up the size of the existing workforce by developing a pathway for adult learners that starts with English for Speakers of Other Languages, to Adult Basic Education and onto workplace skills training and college degrees and certificates.

In 2016 the Regional Employment Board of Hampden County has identified 1,700 current vacancies in food preparation and related food serving occupations in Hampden County alone. At the same time there will be a number of gaming related positions, which are new to the region. In fact, these proposed activities are well aligned with our internal efforts to expand access to and increase the quality of Career and Technical Education opportunities in the Greater Springfield Region. For employers, a well-designed and effective pipeline for our workforce is key to our region's future growth.

We look forward to working with the Gaming Commission, the Commonwealth, the regional Workforce Development System and MGM to flush out the details of the development and implementation of this plan especially in relation to training, funding, scheduling and specifically the recruitment of a diverse and qualified labor pool that will serve the needs of the entertainment/hospitality industry and MGM.



We are committed to increased coordination with MGM Springfield in order to expand access to the thousands of jobs that will be available in 2018. I hope you won't hesitate to contact either one of us if you'd like to learn more about our involvement in and commitment to this project.

Sincerely,



Dr. Jeremiah Riordon, VP of Workforce  
Springfield Technical Community College



Jeffrey P. Hayden, VP of BCC  
Holyoke Community College

*Also Doing Business As*



## **Massachusetts Casino Careers Training Institute**

---

**Training and Workforce Options**  
c/o 303 Homestead Avenue  
Holyoke, Massachusetts 01040  
413-552-2587  
[jhayden@hcc.edu](mailto:jhayden@hcc.edu)  
[jriordon@stcc.edu](mailto:jriordon@stcc.edu)

## Griffin, Jill (MGC)

---

**Subject:** FW: MGM Workforce Development Plan

-----Original Message-----

From: LePage, Robert (EOE)

Sent: Monday, April 10, 2017 3:06 PM

To: Griffin, Jill (MGC)

Subject: RE: MGM Workforce Development Plan

Good afternoon Jill -

I have reviewed the MGM workforce plan. While it firmly address the process MGM will use to hire individuals to fill the jobs it does not squarely and systematically address the creation and implementation of a "Net Job Gain" plan for the region. Achieving "Net Job Gains" requires some significant level of additional "talent gain" - an increase in the number of individuals qualified for employment in the region. A number of areas that could have been addressed in the MGM plan and whose omission may constrain the goal of job gain and economic success;

- A more detailed review of the current workforce "skill gaps" in the region, in particular related to hospitality and culinary industry occupations that have the potential to impact MGM's success
- A strong review of the scope/size of the recruitment funnel and process timelines in particularly aligned to the city of Springfield and strategy and action steps for meeting host community employment agreements.
- Inclusions of a strategy and actions steps to support a greater number of English Language Learners to achieve employability
- Inclusion of a strategy and actions steps to support a greater number of Adults who have not achieve a High School or GED to achieve employability
- Inclusion of a strategy and actions steps to support a greater number of individuals to be prepared with employability skills
- Inclusion of a strategy and actions steps to support a greater number of individuals to be prepared with customer service skills
- Inclusion of a strategy and actions steps to support a greater number of individuals to be prepared with culinary skills (cooks, line cooks, chefs...)
- A more detailed explanation related to a shift to more part-time employees (ie is this because no full time talent is available and we have no plan to grow it?)
- A detailed talent pipeline development and training plan with action steps and timelines for gaming occupation employees (1/3 of the MGM workforce and the driver of revenues to the Commonwealth) inclusive of partnering for the operation of a "gaming school" and a funding to provide individuals affordable access to training for the gaming jobs. (This is a major omission)
- Inclusion of the regions vocational schools and programs as featured talent pipeline partnering organizations.



# Massachusetts Casino Careers Training Institute



Massachusetts Gaming Commission  
Update – May 25, 2017

Dr. Christina Royal  
Jeff Hayden

Holyoke Community College

&

Dr. John Cook, Springfield Technical

Dr. Jeremiah Riordon  
Community College

# A Joint Effort of Workforce & Training Options

*Let us work for you!*



**TRAINING &  
WORKFORCE  
OPTIONS**

---

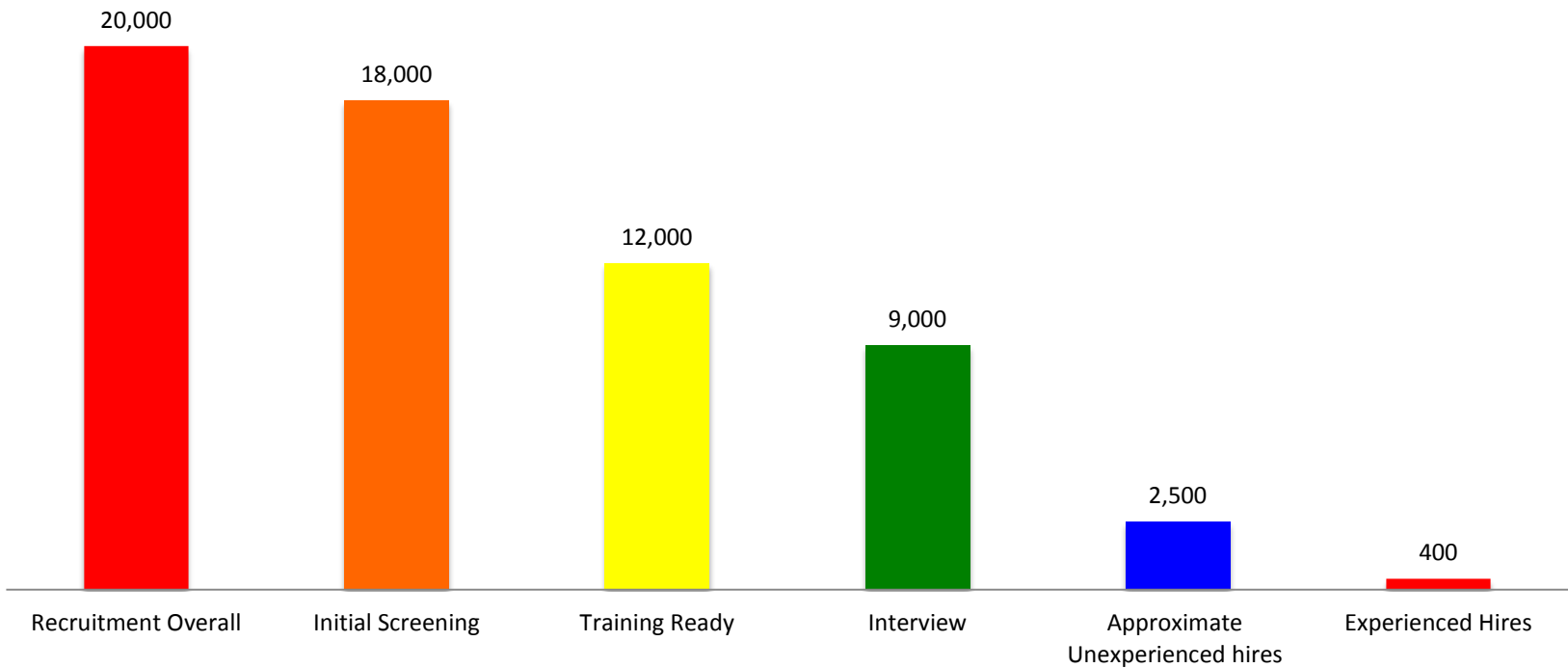
Springfield Technical & Holyoke Community Colleges



# The Workforce Challenge in Region 2



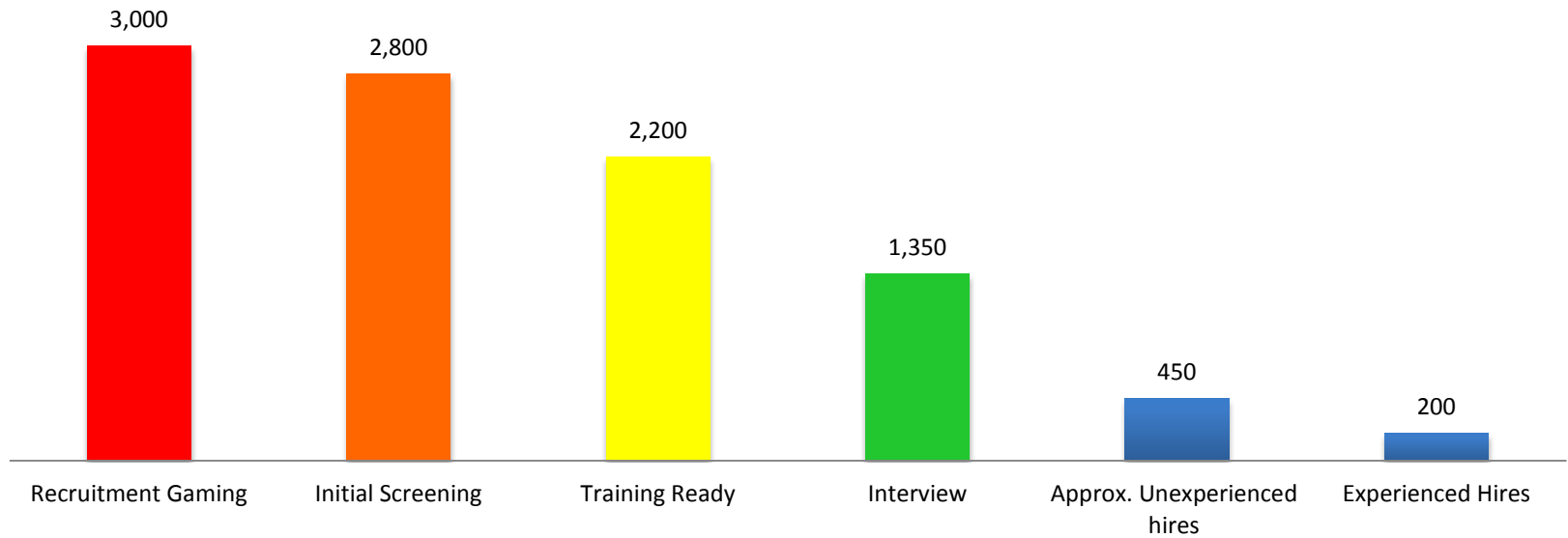
## Labor Challenge



# The Workforce Challenge in Region 2



## Gaming Labor Challenge





# Key Workforce Components



- **Workforce Development Briefings** in order to mitigate impacts on other industries (On-going: Hospitality, Health, Manufacturing, Finance, IT):
- Developing **Career Awareness** Sessions (Educational Pathways – dual enrollment, articulations, Academy Model);
- **Skill Assessments** – Using Career Ready 101 – Adopted by the Commonwealth and integrated into existing training programs;
- Employability & Training Advisement/Counseling and Referral (**Job/Career Readiness**)
- Gaming and Non-Gaming Training – **Scaling up Workforce** – Hospitality and Culinary, Customer Service, cash handling: banking, accounting, developing gaming school, etc.
- **Placement** and/or Audition Services within 6 to 9 months of openings

# WM Workforce Initiatives



- **SkillSmart and MGM Career Launches;**
  - Colleges have designed a joint landing page; and,
  - Colleges have created 6 courses to address the top 6 skills identified by MGM and SkillSmart including Customer Service
  - Over 40 outreach events to vocational high schools and potential jobseekers
- **MGM HCC Culinary Institute;**
- On-going and new **Programming;**
- **Grant Activity;** and,
- **Gaming School Development.**



# Culinary Institute



- \$6 M investment
- Construction in process
- November 2017 opening with Workforce Development
- Credit Certificate and Degree Programs in January of 2018
  - New remedial track to be implemented in Fall of 2017 – English/Math/Culinary courses
  - New Credit Certificate – Fall 17 – 24 credits students able to complete in less than a year – New 2yr. Assoc. in 2018



# Programing - WM Region



## OFFERINGS –On-going:

- **Culinary & Hospitality** Training Programs, **Customer Service**;
- STCC **Customer Service** condensed **credit certificate** prog.;
- Both colleges offering stackable credentials (**ServSafe, TIPs, OSHA, NCRC**);
- Adult Basic Education Collaboration; **ESOL and ABE to career pathways.**

## NEW – To be offered:

- Private **Security Training** Certificate (STCC) as well as a new **Brew Masters** license program; and,
- **Gaming** School Curriculum, Submission of Curriculums to MA Dept. of Labor (Training Pro) and Workforce Development and MGC is in process.





# Grant Activity

- **Current:**

- Commonwealth Corporation WCTF grant for culinary – on-going through FY 18;
- Transition to College and Careers
- Integrated Education and Training Grants:
  - Partnership with Hampden County Sheriff’s Department – Culinary and Hospitality – first cohort complete;
  - Partnership with Putnam Vocational High School – Culinary – summer 2017; and,
  - Two Healthcare grants also used to scale the labor pool.



# Grant Activity

- **In-Process:**

- Application to MGC Mitigation Fund – ABE/ESOL to workforce pathway – pending;
- MA Workforce Training Fund Program applications for existing Hospitality and Culinary Businesses in the region – Customer Service, C/H training – 4 applications to be submitted in June/July 2017 – purpose is to increase the size of the region’s labor pool; and,





# Massachusetts Casino Careers Training Institute

**Gaming School Planning**

**May 25, 2017**

# Planning for the Gaming School

- **Key Dates**
- **Confirmation of Assumptions**
- **Pro-forma**
- **Funding Models**
- **Next Steps**



Massachusetts Casino Careers  
Training Institute



# Key Dates



- **Timing:**

- **MGM Resorts HCC Center for Hospitality and Culinary Arts – Opens Summer of 2017**

- Workforce Programming being developed now, Marketing in May/June; recruitment continuous from spring 17 through MGM Springfield grand opening
- Marketing for Credit Certificate Program in place for Spring and Summer – building to a capacity of 100 through FYs 18/19 – new remedial Culinary 095 and new culinary certificate (24 credits) to be implemented in the Fall of 2017
- Hospitality & Culinary Arts Center – events and marketing in Planning
- Summer Training at Putnam HS confirmed

- **Gaming School Opens – Winter 2017/18 (November)**

- Application to be submitted in June 2017
- Requires location, equipment, curriculum, schedule and funding model to be approved
- Dept. of Education Review and Approval
- MGC Gaming School License
- Training Recruitment must be in place for Fall 2017
- Classroom training begins in late 2017 with lab training beginning in early 2018

# Key Dates (Continued)

- **Confirmed:**
  - **MGM Career Center Opens – January/February 2018;**
  - **Summer 2018 – Mass Hiring Events / Job Offers; and,**
  - **September 2018 – Grand Opening.**



Massachusetts Casino Careers  
Training Institute





# Basic Assumptions

- **Basic Assumptions for Developing the Gaming School:**
  - 6/1 Job Seeker to Job ratio into the training system;
  - Anticipated that MGM will interview 3 persons for every position;
  - Based on Head Count (See Training/Employment Funnel);
  - All dealers will be required to be trained in 2 games, except poker dealers; and,
  - Gaming School Lab will be at 95 State Street, Springfield in Jan/Feb of 2018 for pre-opening gear up of the casino. MGM will enter into a license with MCCTI for the space – MGM will do build-out, provide equipment and maintain the facility.

# Basic Assumptions (Cont.)



- **Assumptions for Developing the Gaming School:**
  - MGM will provide the gaming equipment and related materials per Gaming School regulations – MCCTI will obtain the proper licensing;
  - 3 terms (Dec 17/Jan 18, Feb/March 18, April/May 18), 4 cohorts per term estimated **yield** 1750 at maximum capacity (6 am, noon, 6 pm, midnight);
  - 20/30 hours/week per student – program lengths vary;
  - Practice opportunities on-going throughout;
  - Participants will pay a nominal fee for each training – with the hope that WIOA vouchers and other workforce training grants or scholarships could off-set this fee;





# Pro-forma

- **Proforma Assumptions** – (See Training for Gaming Occupations and tentative schedule)
  - Direct Training Expenses
  - Indirect Training Expenses
  - Space/Equipment/Other
  - Revenue Sources – Grants, Partners, Individual Students
- **Scheduling Assumptions**
  - Individuals – Average of 2 to 2 1/2 months to complete Gaming Orientation and training requirements and training in two games;
  - Training – 4 Sessions per day, 3 terms (Dec/Jan, Feb/March, April/May) – with some overlap; and
  - **Yield** 1,750 at maximum capacity (completion factors included)

# Multiple Funding Sources for Gaming Training



- **WIOA Vouchers**
- **Eligible State Workforce Grants (TBD)**
- **Students** – Participation in \$300 to \$600 range\*
- Develop Training/**Scholarship Fund** for 600 students at \$600 each student/year for two years
- **MGM's** participation (space/build-out, equipment, cost of instructors) – estimated investment of well over \$1M+
- **MGM and MCCTI's** Investment in planning is estimated an in-kind contribution of approximately \$400,000
- **Community College Foundations** – student support Investment \$50,000
- It should be noted that significant investment has already been made in hospitality and culinary training, customer service programming and training for the pathway from ABE and ESOL to workforce training.





# Schedule of Next Steps

- **MCCTI Prepare License Application for submission in June 2017;**
- **Finalize and Implement the Recruitment Strategy – 15,000+ individuals;**
- **Finalize Schedule of Training – terms /cohorts;**
- **Course Manuals are complete for all training areas; and,**
- **Seek grant funding for training – on-going**

# Needs for Continued Workforce Development Success



- **Continued support to develop workforce training capacity and funding;**
- **Scholarship fund to off-set potential student training fees - \$600. for 600 individuals in both FY 18 and 19;**
- **Support to increase recruitment for entry-level services jobs – Concerned about a shrinking labor pool in the region and service employee restrictions ; and,**
- **Support of applications to MA Department of Labor and Workforce Development and the Department of Higher Education for Curriculum approval.**



# Massachusetts Casino Careers Training Institute



**Questions  
&  
Observations**



TO: Chairman Crosby, Commissioners Cameron,  
Macdonald and Zuniga

FROM: Commissioner Bruce Stebbins

Jill Griffin, Director of Workforce, Supplier and  
Diversity Development

CC: Edward Bedrosian, Executive Director; Catherine  
Blue, General Counsel; Derek Lennon, CFAO; John  
Ziemba, Ombudsman

DATE: May 22, 2017

RE: Gaming Economic Development Fund

---

## **BACKGROUND**

The Expanded Gaming Act of 2011 created several funds as repositories for monies flowing from the taxes on Gross Gaming Revenue (GGR) of our Class 1 casino licensees. These new funds are established and outlined in M.G.L. c. 23K Sec 59 (2) (h) and M.G.L. c. 29 Sec 2DDDD.

One of those funds is the Gaming Economic Development Fund. Monies for this fund will begin to accumulate during the Commonwealth's FY 2019 (July 1, 2018 – June 30, 2019) as MGM Springfield and Wynn Boston Harbor are set to open during that fiscal year (MGM Springfield in September 2018 and Wynn Boston Harbor in June 2019). The fund, which is subject to appropriation by the legislature, is targeted for uses including (1) workforce training, (2) tourism promotion, including regional tourism promotion agencies and cultural and recreational attraction promotion; (3) summer jobs; (4) the Massachusetts marketing partnership; (5) higher education scholarships; (6) regional economic development initiatives; (7) support for small businesses, including small business lending; (8) green jobs promotion; (9) science, technology, engineering and mathematics career pipeline initiatives; and (10) agricultural development programs. The majority of these priority uses are well aligned with the economic impact we expect to realize from the development of the Class 1 resort casinos in Springfield and Everett and the Class 2 casino in Plainridge.

In advance of the Fiscal Year 2019 budget development, which begins in early 2018, the commission has decided to engage critical local stakeholders in developing a "White Paper" to outline potential strategies for funding from the Gaming Economic Development Fund. The goal of these strategies is to meet the uses allowed by the fund and maximize the



Massachusetts Gaming Commission



economic impact of the resort casinos. The White Paper report would be created and distributed to members of the legislature by the end of 2017. Items in the White Paper will include among other topics – strategies for funding, how other financial resources are allocated from gaming revenue, and a review of financial commitments to communities through Host and Surrounding Community agreements. Through our research to date, we have not found a jurisdiction that has created a similar fund with a similar purpose that can drive continued economic success for the immediate region of a casino.

### **TIMELINE**

May 2017 – Send out strategy solicitation letters to critical stakeholders and establish dates for local hearings in September 2017.

September 2017 – Host local public hearings in Springfield, Everett and Plainville.

September – October 2017 – Review proposed strategies and invite public feedback and feedback from our gaming licensees.

November 2017 – Prepare White Paper

December 2017 – Present White Paper to state lawmakers.

Attached to this memorandum are the Gaming Economic Development Fund statutory language and the draft strategy “invitation” letter to be circulated once a final version is completed.



Massachusetts Gaming Commission

NAME  
TITLE  
ORGANIZATION  
ADDRESS  
CITY, STATE ZIP

Re: Gaming Economic Development Fund Hearing

Dear [NAME]:

In 2011, the legislature passed and Governor Deval Patrick signed into law the “Expanded Gaming Act”, which introduced a new casino industry and new economic development engine to the Commonwealth. A goal of the act was to positively impact Massachusetts small businesses, the state’s tourism economy as well as to create a wide variety of job opportunities for our residents.

The Massachusetts Gaming Commission (MGC) created and undertook a thoughtful and diligent licensing process (69 meetings in total to review all of the gaming applications) to assess the capacity and interests of our gaming licensees to obtain one of the coveted licenses prescribed for the Commonwealth. Through that license examination process and the interaction the commissioners and our staff have had with other jurisdictions and industry leaders, we have developed a comprehensive scope of knowledge about the Commonwealth’s newest industry. In addition to generating new revenue, we know that the gaming industry can potentially boost the economic climate for a community and the immediate region, provide pathways for those workers seeking to find a new opportunity or begin their career and draw new visitors to the area.

In less than a year and half MGM Springfield will open the doors of its innovative urban casino. Wynn Boston Harbor is scheduled to open in less than two years. When the casinos begin operating in Fiscal Year 2018, a portion of taxes on their gross gaming revenue will be allocated to the new Gaming Economic Development Fund – a fund created by the statute that prioritizes the economic development outcomes highlighted above. Once the Fund is established, the legislature will annually make appropriations for programs and projects that fall within the purposes of the Fund specified in the statute. The authority of the legislature to appropriate these funds is explicit.

Through our ongoing research and outreach, the MGC found limited examples of strategic programs or initiatives that leverage the economic opportunities that are possible with the presence of a destination resort casino. Although we will continue to look for other models, we believe in the tremendous potential value of an effort to identify more ideas to determine which strategies would provide the Commonwealth with the most benefit.

Therefore, we are inviting critical stakeholders like you to consider this opportunity to develop proposals that will not only positively impact both the Commonwealth and the region



immediately around a gaming facility but can potentially leverage continued business success for our gaming licensees.

Massachusetts has a unique opportunity to craft a strategy to use a portion of the monies flowing to this fund to support employment opportunities for the unemployed and underemployed, small businesses and Massachusetts tourism and optimize the objectives of the statute and the purposes of this fund.

We are interested in hearing about proposals that involve regional strategies, partnerships and opportunities to leverage other resources and funding. A partnership model will keep stakeholders committed and help make any strategy a success. During our licensees' evaluation process, we noted the relationships our licensees were creating to meet their goals and we encourage you to follow their example.

It is the Commission's plan to conduct hearings in September to hear your suggestions and proposals. We will conduct these hearings in the Springfield, Everett and Plainville area and specific dates and locations will be communicated shortly. Like so many of the commission's efforts, we will seek public input on these strategies and create a "White Paper" for the legislature's consideration as they appropriate the monies from this fund. We are encouraged that members of the legislative leadership have offered their support for this process and have expressed an interest in viewing our results.

Thank you in advance for your interest and we look forward to hearing from you. In the meantime, please see the enclosed attachment which details the fund and its uses as prescribed in the statute. If you have any questions, please do not hesitate to contact Jill Griffin, Director of Workforce, Supplier and Diversity Development or myself, Bruce Stebbins, Commissioner at [mgccomments@massgaming.com](mailto:mgccomments@massgaming.com) or 617-979-8400.

Respectfully,

Bruce Stebbins, Commissioner  
Massachusetts Gaming Commission

Cc: Host Community  
Surrounding Communities  
Senate President Stanley Rosenberg  
Speaker of the House Robert DeLeo  
State Senator Eric Lesser  
State Representative Joseph Wagner  
State Senator Karen Spilka  
State Representative Brian Dempsey  
State Senator (NAME)  
State Representatives (NAME)

## Expanded Gaming Act of 2011

Section 59. There shall be established and set up on the books of the commonwealth a Gaming Revenue Fund which shall receive revenues collected from the tax on gross gaming revenue received from gaming licensees. The commission shall be the trustee of the fund and shall transfer monies in the fund as follows:

(2) 100 per cent of the revenue received from a category 1 licensee shall be transferred as follows:

(h) 9.5 per cent to the Gaming Economic Development Fund established in section 2DDDD of said chapter 29

SECTION 18. Chapter 29 of the General Laws is hereby amended by inserting after section 2BBBB the following 3 sections...

Section 2DDDD. There shall be established and set up on the books of the commonwealth a separate fund to be known as the Gaming Economic Development Fund. The fund shall be credited with revenues transferred to it from the Gaming Revenue Fund established in section 59 of chapter 23K. **Amounts credited to the fund shall be expended, subject to appropriation, to support economic development and job growth including, but not limited to: (1) workforce training, including transfers to the Workforce Competitiveness Trust Fund established in section 2WWW of chapter 29; (2) tourism promotion, including regional tourism promotion agencies and cultural and recreational attraction promotion; (3) summer jobs; (4) the Massachusetts marketing partnership established in section 13A of chapter 23A; (5) higher education scholarships; (6) regional economic development initiatives; (7) support for small businesses, including small business lending; (8) green jobs promotion; (9) science, technology, engineering and mathematics career pipeline initiatives; and (10) agricultural development programs, including youth agricultural education.**



**No Documents**



TO: Commissioners

FROM: Carrie Torrisi, Staff Attorney

CC: Ed Bedrosian, Executive Director  
Catherine Blue, General Counsel

DATE: May 22, 2017

RE: Nongaming Employees

---

A survey of statutes and regulations governing nongaming employees in Nevada, Pennsylvania, Maryland, and Michigan reveals that the statutes in all four jurisdictions include some reference to “nongaming” employees, personnel, or activities, and provide some type of exemption for certain employees falling within such categories. In addition, all states surveyed other than Nevada require that prospective employees in such categories apply to be licensed or registered and submit to a criminal background check.

## **I. Definitions and Licensing/Registration Requirement**

### **A. Nevada**

Nevada’s statute specifically exempts from the definition of “gaming casino employee” those “personnel whose duties are related solely to such nongaming activities as entertainment, hotel operation, maintenance and the preparation and serving of food and beverages.” N.R.S. 463A.020. There are no provisions in either Nevada’s statutes or regulations requiring licensing or registration of these types of employees.

### **B. Pennsylvania**

Pennsylvania’s statute also provides an exemption within its definition of “gaming employee” for “bartenders, cocktail servers or other persons engaged solely in preparing or serving food or beverages, clerical or secretarial personnel, parking attendants, janitorial, stage, sound and light technicians, and other nongaming personnel as determined by the board.” 4 Pa.C.S.A. § 1103.

Pennsylvania does not further define “nongaming personnel” in statute or regulation, but the Pennsylvania Gaming Control Board’s Nongaming Employee Registration Form states that nongaming classifications include, but are not limited to: bartender; cocktail server; persons solely engage in preparing or serving food or beverages on the gaming floor or in restaurants adjacent to the gaming floor; janitorial personnel; stage, sound, and light technicians; valet parker; other positions which the Board will determine based on certain identified criteria.<sup>1</sup>

---

<sup>1</sup> [https://www.pgcb.state.pa.us/files/licensure/applications/initial/Non-Gaming\\_Employee\\_Registration\\_Form.pdf](https://www.pgcb.state.pa.us/files/licensure/applications/initial/Non-Gaming_Employee_Registration_Form.pdf) last accessed May 22, 2017).





Additionally, Pennsylvania’s regulations define “nongaming employee” as:

An employee of a slot machine licensee, manufacturer, manufacturer designee, supplier or gaming service provider which is not included within the definition of “principal,” “key employee,” or “gaming employee,” and

- (1) Whose job duties require the employee to be:
  - a. On the gaming floor but do not require the employee to touch or have contact with slot machines, table game devices or associated equipment other than exterior contact that does not affect the play of the game.
  - b. In a restricted area and the employee:
    - i. Is under the constant supervision of an employee of the slot machine licensee who is licensed or permitted and has appropriate access clearance to be in the restricted area.
    - ii. Is not required to touch or have contact with slot machines, table game devices or associated equipment other than exterior contact that does not affect the play of the game.
- (2) Who the Board determines, after review of the work being performed, requires registration for the protection of the integrity of gaming. 58 Pa. Code § 401a.3.

Such employees falling within this definition of “nongaming employee” must apply to be registered with the Pennsylvania Gaming Control Board, and “the Board may register the individual if the individual has proven that he is eligible and suitable to be registered.” 58 Pa. Code § 435a.1 and 435a.5.

### C. Maryland

Maryland’s statute does not create a specific exemption for certain categories of casino employees, but does grant the Maryland Lottery and Gaming Control Commission the authority to “exempt categories of video lottery employees<sup>2</sup> who are not directly involved in the video lottery operations from the [licensing requirement] if the Commission determines that the requirement is not necessary in order to protect the public interest or accomplish the policies established under [the regulations].” MD Code, § 9-1A-06.

In its regulations, Maryland defines “nongaming employee” as:

[A]n individual who is:

---

<sup>2</sup> Note that “video lottery employees” refers to casino employees.



- (a) Employed or is seeking to be employed by an applicant for or holder of an operation license and whose duties are or will be other than the duties of a gaming employee;<sup>3</sup> or
- (b) Otherwise required by the Commission to be licensed as a gaming employee. COMAR 36.03.01.02.

Pursuant to Maryland’s regulations, the Commission may issue licenses to employees falling within the definition of “nongaming employee.” COMAR 36.03.02.12.

#### D. Michigan

Michigan’s statute defines “occupational license” as “a license issued by the board to a person to perform an occupation in a casino or casino enterprise which the board has identified as requiring a license to engage in casino gaming in Michigan.” M.C.L.A. 432.202. While the statute does not define the term “nongaming employee,” it does provide that the board may issue an occupational license to an applicant who “will perform only nongaming functions.” M.C.L.A. 432.208.

Michigan’s regulations expand on the licensing issue by providing that an occupational license must be held by “[a]n individual who is employed by a casino licensee, casino enterprise, or a supplier licensee whose work duties are directly related to, or involved in, the gambling operation or performed in a restricted area of a casino or in the gaming area of a casino...” Mich. Admin. Code R. 432.1302. The regulations classify three separate levels of occupational licenses, with Level 3 including individuals whose employment duties “are performed in the casino gaming area or affect gambling operations,” such as a person who “serves food or beverages in the casino gaming area to patrons” or any other employee “whom the board requires to be licensed to ensure compliance with the act and these rules and to protect the public and ensure the integrity and credibility of gaming in the state.”<sup>4</sup> Mich. Admin Code R. 432.1334.

---

<sup>3</sup> Maryland’s regulations define “gaming employee” as:

[A]n individual who:

- (a) Is or is seeking to be employed by an applicant for or holder of an operation license, whose duties relate or will relate to the operation of a facility, and who performs or supervises or will perform or supervise the performance of:
  - (i) Operating, servicing, or maintaining a video lottery terminal, table game, or associated equipment;
  - (ii) Accounting, maintaining, or auditing a facility’s financial records;
  - (iii) Counting or processing video lottery terminal or table game revenue;
  - (iv) Conducting security or surveillance in or around a facility; or
  - (v) Operating or maintaining a facility’s information systems;
- (b) Is employed by a contractor or manufacturer, whose duties directly relate to the repair, service or distribution of a video lottery terminal, table game, or associated equipment, or is otherwise required to be present on the gaming floor or in a restricted area of the facility;
- (c) Is employed by a contractor or as a junket representative; or
- (d) Is otherwise required by the Commission to be licensed as a gaming employee. COMAR 36.03.01.02.

<sup>4</sup> Level 1 occupational licensees include individuals who supervise specific areas related to gambling or who have authority to develop or administer policy plans related to gambling operations, management of the casino, and other casino operations. Mich. Admin Code R. 432.1332.





Finally, the regulations permit the Board to “exempt any person from the occupational licensing requirements...if the board determines that the person is regulated by another governmental agency or that licensing is not deemed necessary to protect the public interest or accomplish the policies and purposes of the act.” Mich. Admin Code R. 432.1331.

## II. License/Registration Application Requirements

Of the four states surveyed, the three that have a licensing or registration process for nongaming employees include in their processes some form of background check and criminal investigation. Pennsylvania requires applicants to submit their criminal history, as well as submit to fingerprinting, handwriting sampling, and photographing (to include visible scars, marks, and tattoos).<sup>5</sup> 58 Pa. Code 435a.5. Maryland also requires an applicant to submit a criminal history as well as to provide copies of fingerprints for purposes of a background investigation.<sup>6</sup> COMAR 36.03.02.03-04. Finally, Michigan requires an applicant for a level 3 occupational license to submit a criminal history as well as previous bankruptcies and related financial information, copies of tax returns, and copies of fingerprints.<sup>7</sup> Mich. Admin. Code R. 432.1336.

---

Level 2 occupational licensees include individuals “whose employment duties predominantly involve the maintenance, servicing, repair, or operation of gambling games, gaming, gaming machines, devices or equipment, or assets associated with the casino licensee or supplier licensee, or regularly requires work in a restricted casino area.” Mich. Admin Code R. 432.1333.

<sup>5</sup> [https://www.pgcb.state.pa.us/files/licensure/applications/initial/Non-Gaming\\_Employee\\_Registration\\_Form.pdf](https://www.pgcb.state.pa.us/files/licensure/applications/initial/Non-Gaming_Employee_Registration_Form.pdf) last accessed May 22, 2017).

<sup>6</sup> <http://slots.mdlottery.com/wp-content/uploads/2011/01/Form-2002-Non-GamingEmp.pdf> (last accessed May 22, 2017).

<sup>7</sup> [http://www.michigan.gov/documents/f-occ3\\_5326\\_7.pdf](http://www.michigan.gov/documents/f-occ3_5326_7.pdf) (last accessed May 22, 2017).



May 22, 2017

Massachusetts Gaming Commission  
101 Federal Street, 12th Floor  
Boston, MA 02110

**Re: Automatic Criminal Background Disqualification**

Dear Chairman Crosby and Members of the Commission:

Please accept this letter on behalf of Blue Tarp redevelopment, LLC (“MGM Springfield”) related to the Massachusetts Gaming Commission’s (the “Commission”) ongoing discussion of the criminal background disqualification issue, particularly as applied to non-gaming and line level, i.e., gaming service employees.

**The Issue.** The decision before the Commission is whether it will maintain its current interpretation that the Gaming Act requires the same criminal background automatic disqualification of non-gaming and line level job applicants with no involvement in the gaming operation as it applies to license owners and key gaming employees having a direct involvement in the gaming operation. As discussed below, we believe that interpretation impacts approximately 1,000 non-gaming jobs at the MGM Springfield facility (approximately a third of the total 3,000 jobs), and will prevent thousands of potential job applicants from seeking entry level positions, frustrating the legislative goal of the Gaming Act to provide employment opportunities to the underemployed, particularly those in the communities hosting the gaming establishments.

We recognize that the Commission is struggling with the impact of its current position, and we commend the Commission and its staff on the diligence with



which the Commission and its staff have collectively discussed, analyzed and candidly labored over this issue. As the Commission staff's April 27, 2017 memo on this topic discusses, MGM Springfield recognizes that, in addition to the legislative mandate for the Commission to provide broad employment opportunities, the Commission is also entrusted to ensure the integrity of the gaming establishments operated by its licensees.

So, how are these two legislative mandates to be respected? By holding the owners, key executives, and individuals involved in the gaming operation to a different standard than the warehouse manager, kitchen porter, and bowling alley clerk.

The legislature already created the framework to treat these categories of employees differently, distinguishing between individuals that would be required to apply for a license for a gaming position from those that the Commission could simply register for a service position. MGM Springfield has attached a detailed legal analysis of the Gaming Act, citing the numerous provisions where the legislature evidenced its intent that these two classes of job applicants be held to two differing standards and requirements. While we recognize that the Gaming Act does not provide perfect guidance on this issue based on extraneous phrases or what appears to be internally inconsistent and loose references to "applicants" and "registrants", we believe that the Commission will have to ignore or render meaningless far too many provisions of the Gaming Act to maintain its current position, in an effort to reconcile a single section of the act (Section 16(b)), which even proponents of a restrictive reading will acknowledge is itself incomplete and internally inconsistent. Importantly, to rely on Section 16(b) to apply the criminal disqualifier to non-gaming and service level job applicants, the Commission would not only have to ignore many provisions of the Gaming Act, but it would have to essentially

create new law by inserting the word, “registrant” into the operative clause of Section 16(b), where the Legislature only drafted Section 16(b) to apply to “applicant[s]”, a defined term under Section 2.

**What’s at stake?** While the Commonwealth enjoys a relatively low unemployment rate of approximately 3.9%, there are areas of the State which continue to struggle. Hampden County, for example, has an unemployment rate of 4.4%, nearly twenty percent higher than the State average. That disparity is greatest in Springfield at a rate of 6.8%, with 4,355 unemployed in our host community. Further, the demographics of Springfield and other gateway communities such as Holyoke indicate that minority communities will be significantly impacted. Hampden County, and particularly Springfield, have disproportionately high minority populations. Commonwealth (16.8%), Hampden County (32.3% diverse), Springfield (65.6%).

**UNEMPLOYMENT IN WESTERN MASSACHUSETTS**  
*Source: MA Executive Office of Labor and WFD as of March, 2016*

City or Town	Labor Force	Employed	Unemployed	Rate
Agawam	16,189	15,547	642	4.0%
Blandford	766	735	31	4.0%
Brimfield	2,222	2,138	84	3.8%
Chester	747	716	31	4.1%
Chicopee	28,359	26,931	1,428	5.0%
E. Longmeadow	8,824	8,533	291	3.3%
Granville	913	875	38	4.2%
Hampden	3,034	2,929	105	3.5%
Holland	1,631	1,555	76	4.7%
Holyoke	16,541	15,599	942	5.7%
Longmeadow	8,211	7,977	234	2.8%
Ludlow	11,188	10,493	695	6.2%
Monson	4,921	4,722	199	4.0%
Montgomery	520	501	19	3.7%
Palmer	6,268	5,936	332	5.3%
Russell	1,010	974	36	3.6%
Southwick	5,655	5,422	233	4.1%
Springfield	64,174	59,819	4,355	6.8%
Tolland	286	276	10	3.5%
Wales	1,003	954	49	4.9%
W. Springfield	14,842	14,187	655	4.4%
Westfield	21,491	20,531	960	4.5%
Wilbraham	7,731	7,470	261	3.4%

These statistics underpin MGM Springfield’s employment commitments, and the basis on which the residents of Springfield supported our license application.



Our host community agreement (HCA) provides that “the city hereby finds...that...Project will... contribute to the objectives of providing and preserving gainful employment opportunities for residents of the City” § 2.1. This recital is consistent with our commitment in the HCA “to use [ ] best efforts” to have “35% of persons employed...be City Residents” with “no less than 50% of its workforce will be Minority persons...and women” and “2% of its workforce will be Veterans” Exhibit B, § 3(b). For the above reasons, it is particularly problematic that a broad application of the automatic criminal background disqualification will potentially impact our host community and the majority minority populations whose employment opportunities in the gaming establishment were a major consideration for the approval of the MGM Springfield project.

How do we know that Springfield’s labor force and unemployed population will be impacted by a 10 year automatic felony conviction (and select misdemeanor) disqualification look back? In short, we know from the data.

Each year, the Massachusetts Department of Corrections (the MADOC) provides data on felony convict releases into various communities. Those annual reports show that between 2009 and 2015, the MADOC released an average of 2,540 felons per year. On average, Hampden County has received 294 of those felony convicts annually (a rate of 63 per 100,000 residents, compared to the MA rate of 37 per 100,000 residents, or 58% higher). Over that same period of time, Springfield has on average received 215 of those felony convicts annually (a rate of 133 per 100,000 residents, 2X the rate of Hampden County, and 3.6X of the MA rate). Below are the 2014 MADOC data as an example of statistics pulled for this seven year study.

Mass DOC 2014 Criminally Sentenced Jurisdiction Releases to the Street:

Total	2535
Outside Mass	135
Hampden County	276
% of total	10.9%
Springfield	192
% of total	7.6%
% of Hampden County total	69.6%

	Population*	# Released	Rate per 100,000
Massachusetts	6547629	2400	36.7
Hampden County	463490	276	59.5
Springfield	153195	192	125.3

TOP 10 CITIES COMPARISON	Population*	# Released	Rate per 100,000
Boston	617594	489	79.2
Worcester	181045	119	65.7
Lawrence	76377	87	113.9
Brockton	93810	85	90.6
Lynn	90329	84	93.0
New Bedford	95072	74	77.8
Lowell	106519	57	53.5
Fall River	88857	47	52.9
Quincy	92271	45	48.8

The Hampden County Sheriff's Department has advised that they estimate their number of felony convict releases from its facilities at approximately 300 annually, with the majority of those individuals being released into Springfield. Accordingly, just based on the MADOC data and that of the Sheriff's Office, the annual number of felony convict releases into Springfield can be between

400 and 500 annually. Applying that estimate to a 10 year window yields 4,000 – 5,000 individuals in Springfield alone that may be subject to the automatic bar. We do not believe it is coincidental that the Springfield unemployment number is exactly that range, i.e., that it is likely that a significant percentage of the unemployed population has a criminal background, and through application of an automatic disqualifier will remain chronically unemployed.

While the above data and assumptions are imperfect, we believe the above analysis likely significantly undercounts the number of individuals in Springfield and the greater surrounding area that will be impacted by this issue the above statistics do not reflect the impacted misdemeanor population nor does it reflect the other felony convicts that are not part of the State or County population.



**Other Considerations.** We believe it is also important to consider a couple of the practical considerations relating to the Commission's resolution of the automatic criminal background issue as applied to non-gaming positions.

First, if the Commission were to adopt the view that non-gaming employees are not subject to automatic disqualification based on criminal background, would Commission staff be required to manage a case by case mitigation analysis for the potentially thousands of job applicants with a criminal background? The answer is no. The Commission's licensees will already be doing that case by case review of the individual job applicants based on, in MGM Springfield's case, our own internal background check process. Indeed, the Gaming Act already provides the Commission with broad discretion to require whatever background information it deems appropriate for registration. Gaming Act, § 30(c). The Commission staff could defer to the licensees initial review but reserve the right to withhold registration if it believed the circumstances of the criminal background and job relatedness were such as to materially impact the integrity of the operation.

Second, consider the implications of automatically withholding registration from non-gaming employees based on their criminal background. As the Commission and its staff have acknowledged, federal and state employment laws, do not permit the licensees to impose an automatic criminal disqualifier to job applicants with criminal backgrounds. Consistent with the mitigation test provided for in Section 30(f) of the Gaming Act, MGM Springfield will be required to make conditional offers of employment to job applicants where we have found that the circumstances surrounding the criminal conviction as applied to the job in question are such that the circumstances mitigate the concern about the applicant's ability to perform the responsibilities of the

Massachusetts Gaming Commission

May 22, 2017

*Page 7 of 7*

position. Accordingly, in such a situation, the law would require that MGM Springfield conditionally offer positions to individuals that will be summarily rejected for registration from the Commission.

**Summary.** In summary, MGM Springfield believes that the Gaming Act provides overwhelming evidence of the legislature's intent to create different criteria for the licensing and registration of gaming and non-gaming employees, and that on balance, the Commission would be creating new law by imposing the prohibitions set forth in Section 16(b) to registrants, when the language of that provision only applies to applicants. Further, to automatically apply criminal disqualification to non-gaming employees will be inconsistent with MGM Springfield's requirements under federal and state law and will potentially disparately impact Springfield and its minority populations.

Thank you for your consideration.

Sincerely,



Michael Mathis  
President and COO

Encl.

cc:





May 22, 2017

Massachusetts Gaming Commission  
101 Federal Street, 12th Floor  
Boston, MA 02110

Dear Chairman Crosby and Members of the Commission:

MGM Springfield greatly appreciates the time and resources the Commission has committed to reviewing its statutory authority regarding the licensing and registration of employees of gaming licensees. In response to the staff memorandum and presentation at the April 27, 2017 Public Meeting as well as specific concerns raised by the Chairman and members of the Commission, MGM Springfield has reexamined the Gaming Act. Set forth below is a legal analysis of the relevant provisions of M.G.L. c. 23k (the “Gaming Act” or the “Act”), which we believe allows the Commission to read the Act’s provisions harmoniously while giving weight to each term consistent with the enumerated policy goals of expanded gaming in Massachusetts.

***Applicants vs. registrants***

With respect to licensing and registration of employees, the Gaming Act deals with two different categories of employees—“Applicants” (defined term under the Act), on the one hand, and “registrants” (undefined), on the other. Applicants must apply for a license from the Commission; and registrants must register with the Investigations and Enforcement Bureau (Bureau). Key gaming employees and gaming employees are Applicants for licenses as such; and gaming service employees are registrants for registration as such. Consistent with the distinct treatment of Applicants and registrants, the Act provides the Commission with the authority to determine that gaming service employees are not subject to the Act’s automatic disqualification governing Applicants under

Section 16. Instead, gaming service employees may be register with the Bureau under Section 30 (i) commensurate with their job responsibilities; (ii) recognizing the lack of risk to the integrity of gaming and (iii) based on criteria that need not include criminal history.<sup>1</sup>

Section 2 of the Gaming Act specifically defines “Applicant” as “a person who has applied for a license to engage in activity regulated under this chapter”. G.L. c. 23K, § 2. “Application” is defined as “a written request for a finding of suitability to receive a license or engage in an activity which is regulated by this chapter.” *Id.* “Registrant” and “registration” remain undefined.

### ***Section 16 applies to Applicants only; not to registrants***

Section 16 governs grounds for automatic denial of ***Applicants*** for a license or registration. G.L. c. 23K, § 16. Section 16(a) deals with ***Applicants*** for (i) a gaming license and (ii) a key gaming employee license. Section 16(b) deals with all other ***Applicants***. Under Section 16(b), the Commission must deny an application for either a license or a registration,<sup>2</sup> other than a gaming license or a license for a key gaming employee, if the ***Applicant*** “has been convicted of a felony or other crime involving embezzlement, theft, fraud or perjury” G.L. c. 23K, 16(b). Notably, nowhere in Section 16(b) is the term “registrant” or the defined term “gaming service employee” referenced.

### ***Section 30’s distinct treatment of Applicants and registrants***

Section 30 of the Gaming Act governs the separate processes for Applicants and registrants under the Act. It provides that “no person shall be employed by a gaming licensee unless such person has been licensed by ***or*** registered with the commission.” G.L. c. 23K, § 30(a) (emphasis added). This is an either/or proposition. Section 30 then separately sets forth for the provisions that deal

---

<sup>1</sup> For ease of reference, the applicable sections of Chapter 23K and a chart comparing the applicability of each section to Applicants and registrants is attached hereto as Exhibit A and B respectively.

<sup>2</sup> Note, an ***Applicant for registration*** referred to in Section 16(b) can harmoniously be interpreted as something other than a gaming service employee ***registrant***. As explained below, Section 30(c) clearly contemplates a category of employee that is not subject to the minimal registration requirements of required of gaming service employees. Such employees, if any, could be required to be Applicants for a more stringent registration subject to the automatic disqualifier provisions of Section 16(b).



exclusively with Applicants (*see* Sections 30(b),(d),(e),(g), (i)) and those that govern both Applicants *and* registrants (*see* Sections 30(c),(f),(h)). For instance, for key gaming employees and gaming employees, Section 30(b) sets forth the form and type of information that an Applicant is required to submit as part of the Applicant's application for those categories only. *See* G.L. c. 23K, § 30(b). This information includes, but is not limited to, a criminal record and fingerprints.

Section 30(c) also clearly contemplates *four categories* of employees within a gaming establishment. Three of them are Applicants and one of them, gaming service employees, are not Applicants and must simply register – i.e., registrants. Section 30(c) specifically provides:

All other employees in a gaming establishment who are not considered to be [1] gaming employees, [2] key gaming employees or [3] who have restricted access to an area of the gaming establishment or knowledge of security procedures, shall [4] be required to register with the bureau as a gaming service employee and shall produce such information as the bureau may require to become registered under this chapter.

*Id.*, § 30(c). Clearly, Section 30 recognizes *two* categories of employees beyond key gaming employees and gaming employees: (i) employees “who have restricted access to an area of the gaming establishment or knowledge of security procedures” and (ii) all other employees, who are gaming service employees. The former are excluded from simple registration eligibility under Section 30(c) and presumably could become the Applicants for registration referenced under Section 16(b) (though the Act is silent on a name for such category of employees). The latter need only register with the Bureau and provide “information as the bureau may require.”

***Section 30's different treatment of Applicants and registrants is consistent with the exclusion of registrants from Section 16***

Unlike an Applicant for a key gaming employee license or a gaming employee license, the Commission is *not required* to gather information, including criminal record and fingerprints, from a gaming service employee registrant to determine whether or not the registrant is disqualified from obtaining a license. The different process and documentation that is required for a Section 16 Applicant and a Section 30(c) registrant clearly reflects a legislative recognition that they are not subject to the same scrutiny or standards.<sup>3</sup>

Interpreted consistently with the distinction between a Section 16 Applicant and a Section 30(c) registrant, Section 30(f) does not compel or mandate automatic disqualification of a gaming service employee registrant. The Commission may choose to, but is not statutorily required to, apply the Section 16 automatic disqualification standard or the Section 12 gaming license applicant standard to any employee – applicant or registrant.<sup>4</sup>

Applying Section 16's automatic disqualification *only to Applicants thereunder* and recognizing the Bureau's authority to register an employee notwithstanding a disqualifying offense is also consistent with Section 30(g), which only provides the Commission with the authority to grant or deny an Applicant for a key gaming employee or gaming employee license and only provides such Applicant a right to appeal a denial. Registration under Section 30(c) for gaming service employees is only required to the *Bureau* not to the Commission. The Commission has no role, let alone a mandate, to approve or deny a Section 30(c) registration. The Section 30(c) registration process with the Bureau is intended to be ministerial under the Act. Section 16, on the contrary, does not apply to Bureau determinations.

---

<sup>3</sup> Like Section 16, Section 12 and Section 13 of Chapter 23K, the Gaming Act's suitability standards and the affirmative obligation to establish suitability (excluding the ongoing duty to cooperate and prohibition on withholding information) explicitly applies to "applicants". Similarly, Section 12 and 13 contain no reference to gaming service employee registrants. *See* G.L.c 23K, § 12 and 13(a).

<sup>4</sup> The admittedly confused use of the terms "applicant" and "registrant" in Section 30(f) is not a model of clarity. However, Section 30(f) can be read harmoniously with Section 16 by reading it to permit, not require, the Commission a broad authority to apply criminal history disqualifier to *any* employee (including gaming service employee registrant) and then, in such case, the ability to exercise discretion to consider rehabilitation. If the automatic disqualifier were applied to a gaming service employee registrant, the discretion to consider rehabilitation is not limited by the ten year look back under Section 16(b), whereas it is so limited with respect to gaming employees and any other Section 30(c) Applicants.



By recognizing the limitation of Section 16's mandatory criminal history disqualification of Section 16 Applicants to the Commission, and *not to* registrants with the Bureau, Section 16 and Section 30 can be interpreted harmoniously, creating tiered standards and scrutiny between Applicants and registrants while at the same time optimizing potential for the Commission to provide access to employment opportunities at gaming establishments, consistent with a key policy goal underlying the Act.

Sincerely,



Seth N. Stratton  
Vice President & General Counsel

# **EXHIBIT A**



# 23K - Definitions

- “Applicant” - a person who has **applied for a license** to engage in activity regulated under this chapter
- “Application” - a **written request for a finding of suitability** to receive a license or engage in an activity which is regulated by this chapter
- "Gaming employee", an employee of a gaming establishment who: (i) is directly connected to the operation or maintenance of a slot machine or game taking place in a gaming establishment; (ii) provides security in a gaming establishment; (iii) has access to a restricted area of a gaming establishment; (iv) is connected with the operation of a gaming establishment; or (v) is so designated by the commission
- "Gaming service employee", an employee of a gaming establishment who is not classified as a gaming employee or a key gaming employee, but is required to register with the commission
- NOT Defined
  - registration
  - registrant

# 23K Section 30

- (a) “No person shall be employed by a gaming licensee unless such person has been licensed by or registered with the commission”
- (b) “Any person seeking a key gaming employee license or a gaming employee license **shall file an application** with the bureau. Such application shall be on a form prescribed by the commission and **shall include**, but not be limited to, the following: (i) the name of the applicant; (ii) the address of the applicant; (iii) a detailed employment history of the applicant; (iv) **fingerprints**; (v) **a criminal and arrest record**; and (vi) any civil judgments obtained against the applicant pertaining to antitrust or security regulation.”
- (c) **All other employees** in a gaming establishment who are not considered to be gaming employees, key gaming employees or who have restricted access to an area of the gaming establishment or knowledge of security procedures, **shall be required to register** with the bureau as a gaming service employee and shall produce such information as the bureau may require to become registered under this chapter.



# 23K Section 30 (con't)

- (d) Upon receipt of an **application** for a key gaming employee license and a **gaming employee license** the bureau **shall conduct an investigation of each applicant** which **shall include obtaining criminal offender record information** from the criminal history systems board and exchanging fingerprint data and criminal history with the department of state police and the United States Federal Bureau of Investigation.
- (f) The commission **may** deny an application for a key gaming employee or gaming employee license or the registration of any other employee of a gaming establishment if the commission finds that an **applicant or registrant** is disqualified under section 16 or may be unsuitable for licensure under any of the criteria set forth in section 12
- (g) After completing an investigation of an applicant for a **key gaming employee or gaming employee license** the bureau shall approve or deny the license. . . . An **applicant** for a key gaming employee or gaming employee license may request a hearing before the bureau to contest the findings. After the hearing, the **applicant** may appeal the decision of the bureau to the commission and the commission may hear the appeal on the record.
- (h) The commission may **condition, suspend or revoke a license or registration** under this section if the commission finds that a **licensee or registrant** has: (i) been arrested or convicted of a crime while employed by a gaming establishment and failed to report the charges or the conviction to the commission; (ii) failed to comply with the requirements of section 14; or (iii) failed to comply with any of the requirements of this chapter pertaining to licensees.
- (i) The commission shall **establish fees** for a **key gaming employee** and a **gaming employee license** which shall include costs incurred for conducting a background investigation into an applicant for a license.

# 23K sec. 16

- (b) The commission shall deny an **application for a license or registration**, other than a gaming license or a license for a key gaming employee, under this chapter **if the applicant**: (i) has been convicted of a felony or other crime involving embezzlement, theft, fraud or perjury; provided, however, that for convictions which occurred before the 10-year period immediately preceding application for licensure, an applicant may demonstrate, and the commission shall consider, the applicant's rehabilitation and whether such conviction should not be an automatic disqualification under this section;



# **EXHIBIT B**

# Applicant v. Registrant

Requirement/Obligation under 23K	Applicant	Registrant
Defined under Section 2	Yes	No
Subject to Section 12 Suitability	Yes	No
Subject to Section 12 Investigation	Yes	No
Subject to Section 13(a) burden to prove suitability	Yes	No
Subject to Section 13(b) continuing duty and duty to cooperate	Yes	Yes
Subject to Section 13(c) prohibition on withholding information	Yes	Yes
Subject to Section 16's automatic disqualification	Yes	No
Subject to Section 30(a) license or registration requirement	Yes	Yes
Subject to Section 30(b)'s application requirement	Yes	No
Subject to Section 30(b)'s fingerprint and criminal record requirement	Yes	No
Subject to Section 30(c)'s registration requirement	No	Yes
Subject to Section 30(d)'s investigation requirement including obtaining CORI	Yes	No
Eligible for Temporary Licensure under Section 30(e)	Yes	No
Subject to discretion to deny for failing to meet section 16 or section 12 under Section 30(f)	Yes*	Yes
Eligible to appeal a denied license under section 30(g)	Yes	No
Subject to suspension or revocation under Section 30(h)	Yes	Yes
Subject to a licensing Fee under Section 30(i)	Yes	No

\*Discretion is limited where the Applicant is subject to Section 16's automatic disqualification



# SPRINGFIELD CITY COUNCIL

36 COURT STREET SPRINGFIELD, MA 01103 (413)787-6170 FAX (413)787-6833

---

May 24, 2017

Massachusetts Gaming Commission  
101 Federal Street, 12<sup>th</sup> Floor  
Boston, MA. 02110

Re: Automatic Criminal Background Disqualification

Dear Commissioners:

As members of the Springfield City Council, we are interested in the MGM Casino being a huge success for our city and providing jobs for about 1000 Springfield residents. The employment target for MGM is 35% Springfield residents out of 3000 employees. Our city will prosper best from the casino if our residents prosper. We need to make it as easy as we can for our residents to get jobs.

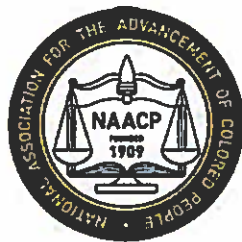
There are criminal history disqualifier provisions contained in the Gaming Act. If those provisions are applied in a strict manner, it could jeopardize the job possibilities for many of our residents. Encounters with the criminal justice system are all too common for many members of our communities – due in large part to the cycle of poverty that continues to pervade our community. These encounters have lasting impact on an individual's abilities to find and maintain gainful employment, which, in turn, can perpetuate a cycle of poverty and further involvement with the criminal justice system. Key to breaking that cycle is opportunity and a job for people in the Greater Springfield area. MGM Springfield represents a big opportunity for employment.

We believe that it is critically important that our constituencies not be overlooked. For so many people in Springfield, MGM Springfield is the opportunity they have been waiting for. If they can't take advantage of this employment opportunity, what will be their next one? It seems only right and also practical to optimize the employment opportunities from MGM Springfield. They will have a larger field of candidates from which to choose and people will have the opportunity that they have been waiting for.

We request that you take the necessary actions to maximize the opportunities for our residents. Thank you for your time and consideration in the very important matter.

Sincerely,

Timothy C. Allen, Michael Fenton, Adam Gomez, Orlando Ramos, President, Melvin Edwards,  
Marcus Williams, Kateri Walsh  
Springfield City Council Members



[www.naacpspringfield.org](http://www.naacpspringfield.org)

# NAACP

P.O. Box 90163  
Springfield, MA 01139  
(413) 650-6154

May 23, 2017

Massachusetts Gaming Commission  
101 Federal Street, 12<sup>th</sup> Floor  
Boston, MA 02110

Re: Automatic Criminal Background Disqualification

Dear Chairman Crosby and Distinguished Commission Members:

This communication is sent on behalf of the Greater Springfield NAACP and the many constituents we represent throughout the Western Massachusetts Region regarding the issue of criminal background disqualification for gaming service employees. We are particularly concerned with its application regarding non-gaming and line level employees.

The Gaming Act, in its strictest interpretation, would require the automatic disqualification of all employees regardless of their involvement in the gaming operations of licensees. This is particularly concerning as this interpretation of the law would both ignore the distinction between those required to apply for a license and those who need only to be registered and summarily disqualify thousands of applicants from our region, having a disparate impact on communities of color.

In accordance with our national organization, the Greater Springfield NAACP has sought to eliminate harsh and unfair sentencing practices that are responsible for mass incarceration and racial disparities in the prison system both in Massachusetts and across the nation. America currently has the largest prison population in the world – 1 in 100 citizens are behind bars. When incarceration is used as the primary response to social problems, individuals, families and communities suffer. The NAACP, both regionally and nationally, consistently calls for policy and administrative changes that will:

- Establish Justice Reinvestment Commissions that will downscale prisons and shift resources from prisons to education budgets;
- Eliminate mandatory minimum sentences for drug offenses;
- Advocate for treatment as opposed to incarceration for non-violent offenders;
- Eliminate sentencing of juveniles to Life Without Parole (LWOP);
- Place a moratorium on the death penalty; and
- Eliminate barriers for the formerly incarcerated.

The NAACP is committed to the restoration of the voting rights of formerly incarcerated people and the removal of barriers to employment. As more than



600,000 individuals leave U.S. prisons each year, our communities continue to grapple with the unique challenges presented by those who ostensibly have "paid their debt to society," yet face barriers to re-entry that effectively continue their punishment. Today, our nation's returning citizens face significant and numerous barriers to finding housing and employment, regaining custody of their children, receiving personal loans or financial aid toward school, voting and possessing other basic resources needed to rebuild their lives. The NAACP calls for policies and practices that:

Eliminate barriers to employment in government and corporation hiring practices;  
Restore voting rights to formerly incarcerated; and  
Remove barriers to receive housing and financial aid for the formerly incarcerated.

The Greater Springfield NAACP represents a community with the highest unemployment rate in the region, approaching nearly 7%. The demographics of our catchment area are predominantly Latino and African American, the very population whose labor population will be most impacted by an automatic disqualification. It is reasonably surmised that the higher unemployment rate in Springfield is directly connected to the difficulty those formerly incarcerated or with felony convictions have in finding employment.

The reluctance of employers to hire people with criminal records, combined with laws that place broad categories of jobs off-limits, is not just a frustration for those unable to find a job that pays a living wage; it has also taken a toll on the broader economy. It is preventing thousands of men and women from becoming productive members of society. The systematic exclusion of people with criminal records is effectively a form of discrimination against people of color, who are disproportionately affected.

Research has proven that employment is one of the most effective ways to reduce the recidivism rate and to support low-income communities. Removing barriers that cut off employment opportunities is critical to helping thousands of our residents qualify for living wage jobs. It is with that in mind that we respectfully request that the Commission refrain from applying the automatic disqualification for all applicants.

Your consideration is appreciated.

Respectfully,

A handwritten signature in black ink that reads "Talbert W. Swan II". The signature is written in a cursive, flowing style.

Bishop Talbert W. Swan, II,  
President, Greater Springfield NAACP

May 22, 2017

Dear Commissioners,

I am writing on behalf of the women served by Dress for Success Western Massachusetts. Seventy-six percent of the women we serve are single mothers, seventy-three percent are on public assistance, and many of these women do not have a clean Cori history. By keeping the current policy, and excluding many of the women we serve, you are denying these women the chance to improve their lives and the lives of their children. The current policy perpetuates the cycle of poverty and must be changed.

You can help these women change their lives and give them a chance to gain economic independence, by changing your policy regarding disqualifying people who have a criminal history from non-gaming jobs at casinos.

Sincerely,



Margaret Tantillo  
Executive Director



GREATER BOSTON LEGAL SERVICES CORI & RE-ENTRY PROJECT  
COMMENTS ON GAMING SERVICE EMPLOYEE REGISTRATION (G.L. c. 23K, §§ 16, 30)  
May 19, 2017

We are writing on behalf of the Union of Minority Neighborhoods and other clients of the CORI & Re-entry Project at Greater Boston Legal Services to comment on the present scheme of disqualifications that will have the effect of excluding and discouraging many individuals with past CORI, especially from communities of color, from applying for casino jobs.

Changes are needed to better align casino hiring practices with the goals of the Legislature in expanding gaming and in enacting CORI reform in 2010 as well as public policies and anti-discrimination laws aimed at promoting equal opportunities and prosperity in communities across the Commonwealth. The Gaming Commission legislation intended to “provide for new employment opportunities in all sectors of the economy, particularly opportunities for the unemployed” and to promote the “development of workforce training programs that serve the unemployed” in need of these jobs. G.L. c. 23K, §§ 1, 18 (emphasis added). Similarly, CORI reform was intended to enable people “to overcome the inherent collateral consequences of a criminal record and achieve meaningful employment opportunities.” Commonwealth v. Pon, 469 Mass. 296, 297 (2014). The use of criminal record related disqualifiers shuts countless job applicants out of the economy, and especially people of color due to racial disparities in the criminal justice system.

I. The Criminal Disqualifiers Set Forth in G.L. c. 23k, §§ 16, 30 Will Have a Racially Disparate Impact on Casino Job Applicants.

It is critical that the Gaming Commission abandon or at the very least, narrowly tailor its use of automatic disqualifiers based on a criminal record because use of these disqualifiers will skew the composition of the casino workforce and affect many potential job applicants. The number of people with CORI has reached epidemic proportions. Nationally, an estimated 29 percent of the adult population have criminal arrest records on file in a state repository. In Massachusetts alone, there are over 2.8 million individual criminal records on file.<sup>1</sup> Use of criminal record disqualifiers will exclude a very large sector of job seekers, including many individuals most in need of jobs because their past criminal records create barriers to employment. In Boston, for example, data from 2012 that indicated whites had an 8.6 rate of unemployment while blacks had a rate of 24 percent and the Hispanics had a rate of 21 percent unemployment.<sup>2</sup> Census data also indicates that a significant proportion of racial and ethnic minorities in Boston and throughout the Commonwealth live in poverty.<sup>3</sup>

---

<sup>1</sup> Claire Kaplan & Len Engel, CORI: Opening Doors of Opportunity, A Workforce and Public Safety Imperative, Report of the Task Force on CORI Employer Guidelines, 11 (Boston Foundation 2007).

<sup>2</sup> Boston Indicators Project, Means What We Value, available at: <http://www.bostonindicators.org/indicators/boston-neighborhoods>.

<sup>3</sup> Francisca Fajana, Race-Based Lawyering: Engaging Minority Communities in Legal Need Assessments, 36 Clearinghouse Rev. 213, 215-216 (2002). The state's ten cities with the highest populations of low income minority

In a post-Ferguson world where the fairness of the legal system is more frequently called into question, there is great awareness that people of color are disproportionately involved in the criminal justice system and often poor. Using automatic disqualifiers or giving undue weight to criminal records rather than conducting an individualized assessment of job applicants will erode confidence in the Commonwealth's commitment to fair hiring practices and racial equality. While Massachusetts takes pride in its overall low incarceration rates compared to many other states, the ratios for incarceration of black and Hispanic individuals are higher than the national average. In 2014, the Massachusetts incarceration rate was 7.5 times higher for blacks than whites while the ratio for the U.S. is 5:1.<sup>4</sup> Our state incarceration rate was 4.3 times higher for Hispanics than whites — much higher than the 1:4 ratio for Hispanics nationwide.<sup>5</sup> In Massachusetts, only seven percent of the total population is black, but 26 percent of the incarcerated population is black. Hispanics make up ten percent of Massachusetts's total population, but are 24 percent of the incarcerated population.<sup>6</sup> Thus, blacks and Hispanics are only 17 percent of our state population, but 50 percent of the people who are incarcerated.

A recent report of the ACLU, *Black, Brown and Targeted*, also documents the persistence of racially discriminatory policing practices. The ACLU studied Boston Police Department's (BPD) "Field Interrogation, Observation, Frisk and/or Search" (FIOFS Reports).<sup>7</sup> FIOS are generated when an officer records an interrogated, observed, stopped, frisked, or searched someone. Controlling for crime, alleged gang affiliation, and other non-race factors, the analysis found that Blacks were subjected to 63 percent of these police encounters, despite making up only 24 percent of Boston's population.<sup>8</sup> Because of racial disparities, the proposed criminal record disqualifiers for casinos will tip the scales in favor of hiring white job applicants over black and Hispanic employees. Legislative and regulatory changes should be made to create a more equitable hiring process.

---

populations (from highest to lowest) are Boston, Springfield, Lawrence, Worcester, Holyoke, Lowell, Lynn, Chelsea, New Bedford and Brockton. *Id.* at 216 n. 10.

<sup>4</sup> Sentencing Project, *State by State Data* (2014), available at: <http://www.sentencingproject.org/the-facts/#map>. The national average for racial disparities is high, but these disparities are even more pronounced in our state.

<sup>5</sup> *Id.* The Council for State Governments Justice Center (CSG) similarly indicated that blacks and Hispanics combined were 54 percent of the Massachusetts prison population in 2014, but only 16 percent of the Massachusetts resident population. Whites were 75 percent of the Massachusetts population, but had a lower rate of incarceration (43 percent) as compared to the combined number of incarcerated blacks and Hispanics (54 percent). CSG, Working Group Meeting 1, slide 22 (January 12, 2016). 2013 CARI data also showed that blacks had a higher conviction rate of 16 percent while only being 6 percent of the Massachusetts population. Hispanics had a 15 percent conviction rate, but were only 10 percent of the population. CSG, Working Group Meeting 2, slide 17 (April 12, 2016).

<sup>6</sup> Prison Policy initiative, Massachusetts Profile, available at:

[https://www.prisonpolicy.org/graphs/2010percent/MA\\_Hispanics\\_2010.html](https://www.prisonpolicy.org/graphs/2010percent/MA_Hispanics_2010.html)

<sup>7</sup> American Civil Liberties Union, *Black, Brown and Targeted* 1 (2014).

<sup>8</sup> *Id.* Racial disparities are not a new issue. See e.g. Carol Rose, *Racial Profiling is Alive and Well*, Boston Globe, A-11 (July 22, 2009) ("Targeting black men as 'suspicious' has long been a problem in Massachusetts Law Enforcement."); Bill Dedham, *Police Chiefs Decry Profiling Study, Racial Disparities Found in Traffic Stops*, Boston Globe (May 4, 2004)(three-fourths of 341 Massachusetts police departments had significant disparities in ticketing or searching of minority motorists); Aleksander Tomic & Jahn Hakes, *Case Dismissed: Police Discretion and Racial Differences in Dismissals of Felony Charges*, 10 A.M. L. & Econ. Rev. 110, 110-111 (2008) (study suggests "more aggressive policing of blacks" and "higher rates of false arrest of blacks for felony charges").



## II. Criminal Records Do Not Correlate with Bad Job Performance.

There appear to be no studies that show that hiring workers with criminal records contributes to increased crime, violence, theft, or dishonesty in the workplace. 2005-2009 Bureau of Justice Statistics show most workplace violence is inflicted by strangers, not employees.

There are some studies suggesting that people with records may be better employees. A study by Evolv showed workers with criminal records were more productive than workers without records. Vivian Giang, Business Insider, *Why Criminals Make Better Employees* (Dec.12, 2012). A recent Harvard-UMass study showed that people in the military with past felonies actually outperformed their counterparts with no records, and were no more likely to be discharged for negative reasons. National Public Radio, [Do Felons Make Good Employees?](#) April 22, 2016. The study found that termination rates for negative reasons, e.g., misconduct or poor performance, were no higher for enlistees with criminal records as compared with those without criminal records. Enlistees with felony criminal records were also promoted faster and more often attained the rank of sergeant than enlistees without criminal records.<sup>9</sup> These preliminary findings suggest that hiring people with felony convictions, following an individualized, holistic screening process, can result in advantageous outcomes. Professor Jennifer Lundquist suspects that people may have “more loyalty to an employer who hires [them] and gives [them] a second chance.”<sup>10</sup> Given the lack of empirical evidence that people with past criminal records do not perform well in the workplace, policymakers and licensors interested in alleviating poverty in communities of color and in promoting equal opportunity hiring should carefully examine the effects of hiring practices that automatically exclude people with past criminal records.

## III. Section 16 and 30 of Chapter 23K Will Promote Racially Disparate Hiring Outcomes.

The U.S. Equal Employment Opportunity Commission (EEOC) has stated that blanket hiring policies that automatically reject any job applicant with a criminal record are discriminatory and usually violate civil rights laws because of their racially disparate impact. The EEOC issued Guidance on hiring practices in 2012 which cautions employers that they should conduct an individualized assessment before rejecting a person with a criminal record. Factors to consider include the age of the offense, the nature and seriousness of the offense, the age of the person at the time of the offense and completion of the sentence, rehabilitation efforts, success in the same type of job without incident after the offense, and the relationship between the type of offense and the job. The EEOC guidance issued in 2012 explains this topic in more detail and is on its web site: [http://www.eeoc.gov/laws/guidance/arrest\\_conviction.cfm](http://www.eeoc.gov/laws/guidance/arrest_conviction.cfm).

---

<sup>9</sup> Jennifer Lundquist, Devah Pager & Eiko Strader *Does a Criminal Record Past Predict Worker Performance? Evidence from America's Largest Employer* (Mar. 31, 2016) (paper presented at Population Association of America 2016 Annual Meeting).

<sup>10</sup> Jena McGregor, *Why Former Felons May be Good Employees*, WASH. POST (May 6, 2016), available at: [https://www.washingtonpost.com/news/on-leadership/wp/2016/05/06/why-former-felons-may-be-good-employees/?utm\\_term=.664ad7f4bc67](https://www.washingtonpost.com/news/on-leadership/wp/2016/05/06/why-former-felons-may-be-good-employees/?utm_term=.664ad7f4bc67).

While section 16 and 30 of Chapter 23K do not bar all applicants with criminal records, these sections will promote racially disparate hiring because they rely so heavily on criminal record checks and include automatic disqualifiers. The Gaming Commission should consider modeling its hiring process, at least in part, on the City of Boston CORI ordinance and regulations that attempt to promote equal opportunity hiring. The City of Boston CORI ordinance requires that its staff not conduct CORI screening for non-sensitive jobs, and conduct CORI checks only at the last stage of hiring for sensitive jobs and uses an EEOC individualized analysis.<sup>11</sup> If casinos can attract a diverse pool of applicants, a similar hiring policy without automatic disqualifiers would likely promote a more racially balanced workforce. and carry out the goal of providing for new employment opportunities in all sectors of the economy. G.L. c. 23K, § 1.

A. Theft or Fraud Convictions Should Not Be an Automatic Disqualification.

Sections 16 and 30 cast too wide of a net. Section 16, for example, provides that “the commission shall deny an application for a license or registration . . . if the applicant: (i) has been convicted of a felony or other crime involving embezzlement, theft, fraud or perjury” within ten years preceding the application for licensure.

“Theft” is a broad term that can include minor offenses such as bouncing a check, shoplifting, and low level offenses. In Massachusetts, the amount needed to trigger a felony for larceny is any offense in an amount over \$250.<sup>12</sup> All New England states have higher thresholds for felony larceny than Massachusetts, and every state in the U.S. have higher thresholds except New Jersey (\$200) and Virginia (\$200).<sup>13</sup> The present \$250 threshold for felony larceny captures many low level offenses and makes felons of countless people. Similarly, the term “fraud” is overbroad and may encompass minor offenses such as bouncing checks, attaching wrong license plates, or other minor crimes sometimes related to poverty. There are likely many low-risk casino jobs, in the kitchen, landscaping, disposing of trash, waiting restaurant tables or other jobs dealing with small amounts of money that should not involve a high level security clearance given the racial disparities that such a disqualification will cause.

A disqualification based on shoplifting and minor crimes has the effect of excluding many workers who committed offenses while they were young adults and later outgrew such behavior. Studies have shown that parts of the brain that control impulsivity and judgment are not fully developed until early adulthood and into a person's mid-twenties. See e.g. Tracy Rightmer, *Arrested Development: Juveniles' Immature Brains Make Them Less Culpable than Adults*, 9 *Quinnipiac Health L.J.* 1, 23 (2005) (internal citations omitted). In striking the death penalty and later life sentences without parole for juveniles, the United States Supreme Court acknowledged brain research and said "it would be misguided to equate the failings of a minor with those of an adult, for a greater possibility exists that a minor's character deficiencies will be reformed." *Roper v. Simmons*, 543 U.S. 551, 570 (2005). See *Graham v. Florida*, 130 S. Ct. 2011 (2010); *Miller v. Alabama*, 132 S. Ct. 2455

---

<sup>11</sup> Boston's CORI ordinance and regulations are available at: <https://www.cityofboston.gov/fairhousing/hrc/cori.asp>

<sup>12</sup> G.L. c. 266 § 30(1).

<sup>13</sup> Legislation is pending to increase the threshold to \$1500.



(2012). Studies also show that most young people age out of criminal behavior as they get older. This is one of the reasons why there are movements to raise the age of the Juvenile Court to 21 or 24 in Massachusetts and other parts of the country.

#### B. Sealed Records, Incomplete FBI Records, and Juvenile Records Should Not Be Considered.

G.L. c. 23K, § 4 grants the commission broad criminal history access to “request and receive from the state police, the criminal history systems board or other criminal justice agencies including, but not limited to, the Federal Bureau of Investigation and the Internal Revenue Service.” Use of FBI background checks raises concerns because the FBI records may include cases from a state court, including *sealed cases* or juvenile cases. While Massachusetts’s CORI laws provide mechanisms to seal Massachusetts cases, sealed Massachusetts criminal cases are not removed from the FBI database. It also is not unusual for the FBI record to indicate that a case was filed, but to contain no information about the outcome of the case such as a “not guilty” finding or a dismissal.<sup>14</sup> Incomplete FBI records or FBI records including juvenile cases disadvantage communities of color because they are consistently arrested at higher rates than whites, and large numbers of their arrests do not result in convictions.<sup>15</sup> Finally, federal regulations provide that “criminal history record information maintained in the [databases used to supply criminal history information for employment purposes] shall include serious and/or significant adult and juvenile offenses.”<sup>16</sup> Nevertheless, the FBI “frequently reports such ‘non-serious’ offenses on criminal records produced for employment purposes.”<sup>17</sup>

The Commission should take measures to ensure that sealed records, incomplete records, or juvenile records are not used as a basis to deny employment.<sup>18</sup> Section 100A of Chapter 276 also provides that sealed criminal records “shall not operate to disqualify a person in any examination, appointment or application for public service in the service of the commonwealth.” Use of juvenile court records also is unfair to applicants given what is known about brain development and public policies generally excluding consideration of such records.

#### C. Decade Long Exclusions are Too Extreme and Inconsistent with Recidivism Literature.

The ten year cut-off distinguishing between automatic disqualifying criminal offenses versus individualized assessments is overbroad. The ten year window preceding an application for licensure conflicts with studies on recidivism. Studies have shown that the risk of re-offending

---

<sup>14</sup> See Maurice Emsellem and Madeline Neighly, Maurice Emsellem and Madeline Neighly, Wanted: Accurate FBI Background Checks for Employment 15 Nat’l Emp’t Law Project (2013) (50 percent of the FBI’s records fail to include information on the final disposition of the case). *available at*

:<http://www.nelp.org/content/uploads/2015/02/Report-Wanted-Accurate-FBI-Background-Checks-Employment-1.pdf> (50 percent of the FBI’s records fail to include information on the final disposition of the case).

<sup>15</sup> Nat’l Emp’t Law Project Faulty FBI Background Checks for Employment: Correcting FBI Record is Key to Criminal Justice Reform 3 (2015), *available at* <http://www.nelp.org/content/uploads/NELP-Policy-Brief-Faulty-FBI-Background-Checks-for-Employment.pdf>.

<sup>16</sup> Maurice Emsellem and Madeline Neighly, *supra* at note 14 (citing 28 C.F.R. § 20.32(a)).

<sup>17</sup> *Id.*

<sup>18</sup> It does not appear that the Legislature specified that the Gaming Commission has access to juvenile court record.

among people who last offended six or seven years ago is the same as the risk of a person with no criminal record committing a crime.<sup>19</sup> Most recidivism occurs within only three years.<sup>20</sup> Thus, the ten year time frames are too long.

- III. The Goals of Job Creation and Employing the Unemployed Should Determine How the Conflicting Terminology Related to Use Of “May” and “Shall” In Sections 16 and 30 are Construed and Whether Discretion May Be Used to Exempt An Applicant from Automatic Disqualification.

Sections 16 and 30 are inconsistent in their use of the terms “shall” and “may” as to when there is discretion to hire a person who provides evidence of rehabilitation. The intent of the gaming statute was to expand opportunities for jobs. If there is confusion, the mandate to offer jobs to the unemployed should guide the interpretation of the statute or otherwise, a very major purpose of the statute, will be defeated. Finally, we wish to bring your attention to a new study by the National Employment Law Project that evaluated occupational licensing criminal background check requirements of all states. Unfortunately, Massachusetts’s received a low score, underscoring that our state agencies should review their policies and seek legislative changes as needed to improve licensing practices.<sup>21</sup>

Thank you for the opportunity to provide comments.

Respectfully submitted,

Pauline Quirion  
Director, CORI & Re-entry Project  
Greater Boston Legal Services  
197 Friend Street  
Boston, MA 02114  
617-603-1554  
[pquirion@gbls.org](mailto:pquirion@gbls.org)

Hannah Tanabe  
Cahill Gordon & Reindel LLP Fellow  
CORI & Re-entry Project  
617-603-1680  
[htanabe@gbls.org](mailto:htanabe@gbls.org)

---

<sup>19</sup> Megan C. Kurlychek, Robert Brame, and Shawn D. Bushway Scarlet Letters and Recidivism: Does an Old Criminal Record Predict Future Offending? 5 *Criminology & Pub. Policy* 483 (2006).

<sup>20</sup> Alfred Blumstein and Kiminori Nakamura, Redemption in the Presence of Widespread Criminal Background Checks 47 *Am. Soc’y Criminology* 327 (2009).

<sup>21</sup> MICHELLE NATIVIDAD RODRIGUEZ & BETH AVERY, UNLICENSED & UNTAPPED: REMOVING BARRIER TO STATE OCCUPATIONAL LICENSES FOR PEOPLE WITH RECORDS (2016), *available at*

<http://www.nelp.org/content/uploads/Unlicensed-Untapped-Removing-Barriers-State-Occupational-Licenses.pdf>.





May 18, 2017

Massachusetts Gaming Commission  
101 Federal Street, 12th Floor  
Boston, MA 02110

**Re: Automatic Criminal Background Disqualification**

Dear Commissioners:

Holyoke Community College and Springfield Technical Community College are open access institutes of higher education and are extremely proud of their long history of providing education and training to those who are unemployed, underemployed or those who have limited educational attainment. Both colleges serve individuals in Hampden County and up and down the Pioneer Valley who need skills to find a job and to build a career. Through education and training we help individuals get a job, get a better job or to do their job better. We advocate for the interests of those individuals who could benefit most from well-paying jobs with opportunities for advancement, and are excited about the potential for the economic development and employment opportunities that come with MGM Springfield's development.

Since 2010, the colleges have worked jointly on workforce training for area business through Training and Workforce Options (TWO). As you know in 2013, through TWO, the Massachusetts Casino Careers Training Institute (MCCTI) developed an agreement with the Massachusetts Gaming Commission as well as with casino developers to scale up the Commonwealth's workforce. Over the years we have worked with all fifteen community colleges to establish educational systems that will meet the training needs of this new-to-Massachusetts industry. The development of the region's workforce has been our primary mission through workplace readiness, skills training and real world, hands-on training. We know that education and training will lead directly to job opportunities and to the development of career pathways for jobseekers.

In the urban core of our region there is a desperate need for basic education and workplace skills for those who have long been unemployed, underemployed and who have had low levels of educational attainment. In Springfield and Holyoke alone there are over 5,000 people who are unemployed, in addition another 2,000 individuals are incarcerated or in pre-release status. Considering the number of entry-level positions that will be available at the MGM Resort this is a



limited pool from which to draw a workforce. In order to meet demand, the Commonwealth, the region, and the workforce ecosystem will need to scale up the size of our region's labor force.


Both colleges have invested heavily in education and training efforts for other industries in order to increase the area's labor pool, specifically manufacturing, information technology, business hospitality and culinary, health care, as well as financial services. In the last three years we have developed thousands of entry-level workers and skilled workers for these industries. The gaming industry is a significant and imminent opportunity.

We have long recognized that the MGM project required an all hands on deck workforce development effort, where individuals will need basic educational skills, high school credentials and workplace skills to get a job and pursue the opportunities available in this \$1 billion investment in downtown Springfield. People with limited education and training and with undeveloped skills now have a chance for a brighter future.

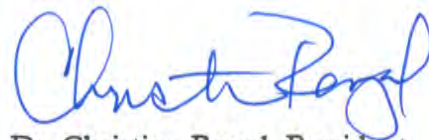
We do, however, remain concerned that strict application of criminal history disqualifier provisions contained in the Gaming Act and the Commission's regulations could potentially close the door on service occupations (non-gaming) opportunities for many individuals who need them most. Encounters with the criminal justice system are all too common for many members of our communities – due in large part to the cycle of poverty that continues to pervade our community - and such encounters have lasting impacts on individuals' abilities to find and maintain gainful employment, which, in turn, can perpetuate a cycle of poverty and further involvement with the criminal justice system. Key to breaking that cycle is opportunity. For the Greater Springfield area, MGM Springfield represents such an opportunity. We believe that it is critically important that our constituencies not be foreclosed, whether by licensing restrictions or self-exclusion due to the licensing process, from access to these employment and career opportunities – in particular, those with no material connection to the casino gaming operations.

We appreciate the opportunity to share our thoughts on this matter and look forward to future discussions. We would appreciate the opportunity to address the Commission on this issue at a future public meeting. In the meantime, if you have any questions or if you require more information please feel free to contact us at your convenience.

Sincerely,



Dr. John B. Cook, President  
Springfield Technical Community College



Dr. Christina Royal, President  
Holyoke Community College



**HOLYOKE**  
**COMMUNITY**  
**COLLEGE**





**Urban League of  
Springfield**

*Empowering Communities.  
Changing Lives.*

MASSACHUSETTS DEPARTMENT OF CORRECTIONS  
2017 MAY 12 PM 12:51

May 9, 2017

Massachusetts Gaming Commission  
101 Federal Street, 12th Floor  
Boston, MA 02110

ROBERT C. JACKSON  
Chairperson

Roland Holstead  
Treasurer Pro-tem

A. CRAIG BROWN  
Clerk

HENRY M. THOMAS, III  
President

Directors  
KAMARI COLLINS  
SHEILA GOODWIN  
ROLAND HOLSTEAD  
ROBERT C. JACKSON  
CURT MARCELLIN  
DAPHNE MOORE  
MAURICE POWE  
REV. W.C. WATSON

JOHN DAVIS  
Director Emeritus

Re: Automatic Criminal Background Disqualification

Dear Commissioners:

On behalf of the Urban League of Springfield, Inc. (SUL), I want to thank the Commission for allowing the opportunity for voices of community advocacy to be heard on this critically important issue. As many of you are already aware, the Urban League of Springfield is currently in its 104<sup>th</sup> year of operation, serving vulnerable populations in the greater Springfield area. Cornerstone to the SUL's mission includes promoting economic self-sufficiency, and fostering racial inclusion and social justice. Over recent decades, the Springfield population has become more vulnerable than almost any other time in its history.

Massachusetts Department of Correction data indicates Springfield receives a higher rate of released felony convicts than other Massachusetts communities. Research also suggests Springfield's vast array of social support services and healthcare makes it a hub for ex-offenders seeking reintegration. It would be irresponsible to ignore this fact, and even more irresponsible to overlook this opportunity to help mitigate circumstances that perpetuate cycles of generational poverty.

MA Labor and Workforce Development data reflect a tightening labor market. As more jobs come on line, opportunities for highly skilled workers increase, and former low-skilled Service employees advance to higher skilled, higher paying positions. Many jobs resulting from the MGM Springfield development (food prep and serving, dishwashing, janitorial, cashiering, etc.) will suit the local area workforce, and should prove immediately impactful. However, as the labor market continues to tighten, there is a great opportunity to assist in the career development of rehabilitated ex-convicts. Stable, gainful employment is essential to upward mobility. We believe the MGM Springfield development will serve as another ideal gateway to progress for individuals in need of employment and a second chance at life.

The Gaming Commission stated as part of its core values "an uncompromising commitment to the integrity of the licensing and regulatory process, and strict adherence to the letter and spirit of [its] Enhanced Code of Ethics, with a thoughtful balance between the need for rigorous regulation and the burden of compliance."

We, along with our community partners, remain concerned that strict application of criminal history disqualifier provisions contained in the Gaming Act and the Commission's regulations could potentially close the door on opportunities for many individuals who need them most. It is critically important that opportunities for our constituencies not be unfairly limited by licensing restrictions, or self-exclusion due to an overbearing licensing process. We would appreciate the opportunity to address the Commission on this issue at a future public meeting.

Sincerely,

Henry M. Thomas, III  
President and CEO



cc: Michael Mathis, President MGM Springfield

**One Federal Street, Bldg. 111-3 • Springfield, MA • 01105  
(413) 739-7211 Telephone • (413) 732-9364 Fax**



**MICHAEL & CARROLL**  
 A PROFESSIONAL CORPORATION  
 ATTORNEYS AT LAW

501 BROADWAY, SUITE 201  
 POINT PLEASANT, NEW JERSEY 08742  
 TELEPHONE: (732) 714-8500  
 TELEFAX: (732) 714-8404

1125 ATLANTIC AVENUE, SUITE 619  
 ATLANTIC CITY, NEW JERSEY 08401  
 TELEPHONE: 609-441-9292  
 TELEFAX: 609-441-9110

MEMORANDUM

REPLY TO: POINT PLEASANT OFFICE   
 ATLANTIC CITY OFFICE

TO: Stephen Crosby, Chairman  
 FROM: Michael & Carroll  
 SUBJECT: Gaming Service Employee Licensing Standards  
 DATE: March 27, 2014

You have asked us to review the present standards established under M.G.L. Chapter 23K ("Act"). You have further requested that we compare those standards to those utilized in other jurisdictions and then provide you with our suggestions about whether it might be useful to revise them in order to better achieve the aims of the Gaming law.

For the reasons that follow, we do recommend that the Commission suggest legislative changes that would provide the agency with greater discretion in determining the qualification of applicants for gaming service employee registration.<sup>1</sup>

1. Present Statutory Standards

Section 30(c) of the Act provides that:

---

<sup>1</sup> We have taken the information contained here from the applicable statutes and regulations. It is our experience that sometimes gaming agencies will promulgate informal policies beyond the words of the published rules. These policies are also often changed. We cannot speak definitively regarding every state's informal practice. We have tried to make this review as comprehensive as possible, but we note this caveat.



**MICHAEL & CARROLL**  
A PROFESSIONAL CORPORATION

*All other employees in a gaming establishment who are not considered to be gaming employees, key gaming employees or who have restricted access to an area of the gaming establishment or knowledge of security procedures, shall be required to register with the bureau as a gaming service employee and shall produce such information as the bureau may require to become registered under this chapter.*

Thus, "gaming service employees" are those persons whose work at the gaming establishment is the least sensitive in terms of the integrity of operations. When determining the qualifications of these persons for permission to work in these positions, Section 16(b) of the Act, in part, requires the Commission to deny registration if the applicant:

*. . . . has been convicted of a felony or other crime involving embezzlement, theft, fraud or perjury; provided, however, that for convictions which occurred before the 10-year period immediately preceding application for licensure, an applicant may demonstrate, and the commission shall consider, the applicant's rehabilitation and whether such conviction should not be an automatic disqualification under this section*  
.....

Accordingly, under this scheme, reading these two statutory provisions together, the Commission is now required to deny permission to persons who want to assume the least sensitive jobs in a casino if those persons have felony or other theft or fraud convictions within ten years of their application. This rule should be analyzed in the context of one of the principle, enunciated purposes of casino legalization in the Commonwealth. Section 1((5) of the Act establishes that:

*the Commonwealth must provide for new employment opportunities in all sectors of the economy, particularly opportunities for the unemployed . . . .*

It is our view that the mandatory disqualification of gaming service employees who have convictions of the type described in Section 16(b) works at cross -purposes with the Legislature's policy declaration at Section 1(5). We also believe that, given the nature of the non-gaming functions served by casino service employees, the restrictions of Section 16(b) are not necessary in order to maintain the appropriate degree of honesty and efficiency in in a casino.

We buttress these opinions with a survey of the standards now utilized by other jurisdictions. In the following section, we will explain those standards.

**MICHAEL & CARROLL**  
A PROFESSIONAL CORPORATION

2. Survey of Other Jurisdictions

We do not offer the comparisons below as an exhaustive list. To do so would be unnecessary and duplicative. We have chosen what we consider the major gaming jurisdictions in the United States. Should you want additional jurisdictional comparisons, please let us know.

New Jersey

Historically, New Jersey licensed all facility employees, including those working solely within the hotel. Gradually, New Jersey lowered those standards. First, the state reduced the standard to registration only. Recently, all pre-approval requirements were dropped. At present, employees who work in non-gaming capacities (analogous to casino service employees in the Commonwealth) are not licensed or registered at all.

In fact, the present licensing system in New Jersey does not even require the licensing of casino employees (defined in New Jersey as those, generally who perform services in the gaming areas, including dealers, et al). This category of employees is only registered and their registration standards include rehabilitation without any mandatory disqualifications.

Nevada

Nevada registers only its "gaming employees" This category is defined to include those positions traditionally associated with direct involvement in gaming activity. It expressly excludes "barbacks or bartenders whose duties do not involve gaming activities, cocktail servers or other persons engaged exclusively in preparing or serving food or beverages." The standard for registration of these employees is discretionary. The Board is not required to deny any applicant. The regulations establish standards within which the Board "may" deny a registration. Approval of persons who work at the gaming facility but are not "gaming employees" are not handled by the Board. Some are required to obtain only Sheriff's work cards.

Ohio

Many years after the New Jersey initial experience, Ohio commenced its operations by licensing only key employees and casino gaming employees. In its definition of "casino gaming employee," the legislation expressly exempts, "an individual whose duties are related solely to non-gaming activities such as entertainment, hotel operations, maintenance, or preparing or serving food and beverage." This description would apply to Massachusetts' "gaming service



**MICHAEL & CARROLL**  
A PROFESSIONAL CORPORATION

employees.” Therefore, Ohio does not require pre-approval of “casino service employees”, let alone require any mandatory disqualification for this category.

Pennsylvania

Pennsylvania issues permits to those persons considered non-gaming employees. Under the controlling legislation, this category includes, “bartenders, cocktail servers or other persons engaged solely in preparing or serving food or beverages, clerical or secretarial personnel, parking attendants, janitorial, stage, sound and light technicians and other nongaming personnel as determined by the board.” These employees would be considered “casino service employees” in Massachusetts.

Applicants for these permits are addressed under a discretionary standard otherwise applicable to all applicants. The governing regulation states in its introduction to the disqualification criteria that:

*An application for issuance or renewal of a license, permit, certification or registration may be denied; or a license, permit, certification or registration may be suspended or revoked if . . . .”*

Accordingly, Pennsylvania provides for no automatic mandatory disapproval of persons who would, under Massachusetts parlance, be considered “casino service employees.”

Mississippi

The Mississippi system requires that those considered “gaming employees” obtain licenses. For this category of employee, the law does contain mandatory disqualification for a wide variety of criminal conduct. However, the definition of “gaming employee” to whom these standards would apply states that, “gaming employee does not include bartenders, cocktail waitresses or other persons engaged in preparing or serving food or beverages unless acting in some other capacity.” There are no pre-qualification requirements for those persons exempted from the “gaming employee” category. Thus, here, too, those who would be considered “gaming service employees” in Massachusetts would have no mandatory disqualifications applied to them.

**MICHAEL & CARROLL**  
A PROFESSIONAL CORPORATION

Missouri

Missouri does contain a mandatory disqualification standard for employees. The State divides employees into two Categories. Category Level I are those who would be considered key employees. Level II includes those who would clearly be considered gaming-related persons, but it also is broad enough to potentially include, at the discretion of the Gaming Commission, some employees who might be considered "gaming service employees" in Massachusetts. The mandatory disqualification applies to both Level I and Level II employees. However, it is temporally more limited than the mandatory terms of the Commonwealth.

Level I and Level II employee applications may be denied for, among other things, any criminal record. However, those applications must be denied for convictions **within 5 years** for convictions for offenses involving generally gambling, theft, fraud or dishonesty. Thus, while Missouri, like Massachusetts, includes a mandatory disqualification requirement for persons who may be similar to "casino service employees", that standard applies only to those within 5 years of application, not 10 years as in the Commonwealth.

Iowa

Iowa is somewhat like Missouri. All persons working on the riverboat casinos must be licensed. There is also a mandatory disqualification requirement for convictions for felonies; theft or fraudulent practices in excess of \$500; using an alias for fraud; illegal bookmaking; and for certain serious or repeated misdemeanors. . However, like Missouri, the mandatory criteria apply only for convictions within 5 years. If the conviction is more than 5 years old, then a showing of rehabilitation is available.

Michigan

Michigan establishes three levels of employee licensure. Level III, the lowest level, includes persons who directly effect gaming but do not come in contact with gaming. Examples include beverage servers, wait staff, maintenance staff and housekeeping personnel, but only those with access to the areas where gaming is conducted. On this basis alone, the Michigan licensing scheme does not include persons who would be "casino service employees" in Massachusetts. However, the system does allow the Board to designate others for licensing in this category at its discretion.



**MICHAEL & CARROLL**  
A PROFESSIONAL CORPORATION

The standards for licensing employees of all Levels are the same and they DO include mandatory disqualification. The rules prevent issuance of a license to any applicant with a felony conviction or with misdemeanor convictions for gambling, theft, or fraud.<sup>2</sup> Therefore, Michigan could be said to be similar in its treatment of "casino service employees", but only in the case of the Board reaching out specially for one of those persons and including them as a special Level III licensee. In the main, Michigan does not provide an automatic disqualification for persons who would be "casino service employees".

### Indiana

Indiana is the only state on our list that does provide for automatic disqualification of persons who would be "casino service employees" in Massachusetts. Like Michigan, Indiana has three levels of employee license. Level 3 is the lowest level. Unlike Michigan, however, the category of Level 3 is much broader. Not only can the regulators designate anyone to require Level 3 scrutiny, but the Level 3 designation applies to "any employee of a riverboat gambling operation whose duties are performed on the riverboat . . ." Accordingly, this would apply to many, if not all, "casino service employees."

In addition, the standard applied to all Levels of employee, including Level 3, contains a mandatory denial for any felony conviction. There is no rehabilitation available and there is no time limit.

### 3. Conclusion

Based on our experience, and on the above analysis of other jurisdictions, we believe that the present statutory standard for the issuance of casino service employee registration is too harsh. We say this with a full appreciation for the need to strictly control casino operations and the people who staff them. However, we come to this conclusion for three basic reasons:

1. The type of work that will be undertaken by casino service employees will not directly impact on the integrity of casino operations. The focus of gaming control should be on the conduct of gaming. Casino service employees will not be involved in that activity.

---

<sup>2</sup> There is also a provision in the Michigan statute that seems to contradict the mandatory standard. It provides only that the Board "may" deny applicants on the basis of these convictions. We have used here the most restrictive interpretation.

**MICHAEL & CARROLL**  
A PROFESSIONAL CORPORATION

2. It is an important stated policy of the Act to foster new employment opportunities for the disadvantaged and the unemployed. Often, sadly, those within this demographic will be more likely to have had some involvement with law enforcement in their past. It is, therefore, counter-productive to render the job possibilities created by the Act to be unavailable to the people who need them most.
3. The experience of other jurisdictions has illustrated that rigid licensing standards for the casino service employee category are not necessary for effective gaming regulation. Most major jurisdictions either don't license this type of employee at all or do so with discretionary standards. We point especially to the experience of New Jersey where the level of scrutiny of this type of employee has continually lessened. It has gone from full licensing to now, no pre-qualification whatsoever.

#### 4. Recommendation

Based on all of the above, we would recommend two potential changes to the Act as it applies to the standards for casino service employees.

Our first recommendation is, we recognize, likely too extreme at this time. It is common at the outset of gaming in any jurisdiction that stricter standards are more popular. It takes a period of successful experience before those standards can be loosened. However, if feasible, we would recommend that the requirement for registration of casino service employees be removed in its entirety. To do so would not interfere with the integrity of gaming. In fact, it could conceivably improve it by allowing the Commission to focus its attention on more sensitive matters.

Our second recommendation would be to make a less radical revision to the present language. We suggest the following:

"Section 16(b) The commission shall deny an application for a *gaming* license [or registration, other than a gaming license] or a license for a key gaming employee under this chapter if the applicant: has been convicted of a felony or other crime involving embezzlement, theft, fraud or perjury; provided, however, that (a) for an applicant for a casino employee license, convictions which occurred before the 10-year period immediately preceding application for licensure, and (b) for applicants for casino service employee registrations, convictions which occurred at any time, an applicant may demonstrate . . . . [remainder remain unchanged] "



**MICHAEL & CARROLL**  
A PROFESSIONAL CORPORATION

We hope this information is helpful to you. We are, of course available to discuss this with you at your convenience. Thank you.

**No Documents**