The Responsible Gaming Framework is designed to provide structure for responsible gaming practices of Massachusetts Gaming Commission licensees and is based on the commitment by the Massachusetts Gaming Commission and their licensees to the guiding value of ethical and responsible behavior.
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Responsible Gaming Framework

Massachusetts Gaming Commission

Introduction
The Responsible Gaming Framework provides an approach through which Massachusetts Gaming Commission (MGC) licensees can ensure their general gaming practices are consistent with the Commission’s expectations that the licensed business will be conducted in a responsible manner to minimize harm caused by gambling to individuals, families and communities. The Responsible Gaming Framework draws upon a shared commitment to best practice in the provision of responsible gaming.

The MGC Responsible Gaming Framework supports the implementation of the expanded gaming law (chapter 194 of the Acts of 2011, M.G.L. chapter 23K, or “the Gaming Act”) of the Commonwealth of Massachusetts. The legislation includes a number of key principles to ensure the successful implementation of expanded gaming including, protection for host and surrounding communities and mitigation for social impacts and costs. See more at:
http://massgaming.com/about/expanded-gaming-act/#sthash.SzzqvJqm.dpuf

Rationale
The Responsible Gaming Framework is designed to provide structure for responsible gaming practices of Massachusetts Gaming Commission licensees and is based on the commitment by the Massachusetts Gaming Commission and their licensees to the guiding value of ethical and responsible behavior.

Key Terms:

Responsible gaming

Responsible gaming is the provision of gambling services in a way that seeks to minimize the harm to customers and the community associated with gambling.

Problem gambling

Problem gambling is characterized by difficulties in limiting money and/or time spent on gambling which leads to adverse consequences for the gambler, others, or for the community.
Guiding Values & Principles

The Responsible Gaming Framework is guided by the values expressed in the mission statement of the Massachusetts Gaming Commission:

*The Massachusetts Gaming Commission will strive to ensure that its decision-making and regulatory systems engender the confidence of the public and participants, and that they provide the greatest possible economic development benefits and revenues to the people of the Commonwealth, reduce to the maximum extent possible the potentially negative or unintended consequences of the new legislation, and allow an appropriate return on investment for gaming providers that assures the operation of casino-resorts of the highest quality.*

To this end, the MGC Responsible Gaming Framework’s aim is to create a sustainable, socially responsible, and accountable approach to gaming. The responsible gaming regulatory framework reflects the Commission’s values and evidence-based information while striving for efficiency and retaining flexibility to respond to the evolving technological and cultural environment.

The MGC believes licensees have an important, but not isolated, role in minimizing the potential harm of gambling. Government, science, industry, and gaming consumers must all take part to most effectively minimize harm caused or exacerbated by gambling.
Goal & Objectives

Goal: To create a sustainable, socially responsible, and accountable approach to gaming.

Regulatory Objectives:
- Minimize harm from gambling to individuals and communities commensurate with the good of the Commonwealth and gaming licensees.
- Promote best and promising responsible gaming practices among licensees.
- Promote responsible gaming practices in all aspects of licensee activities.
- Utilize principles of responsible gaming to all new and emerging technologies

Research Objectives¹:
- Inform best practice in responsible gaming strategies and methods, problem gambling treatment and prevention, and responsible gaming messaging.
- Create and translate knowledge to support evidence-informed decision making about gambling policy and regulation.

Education Objectives:
- Provide accurate and balanced information to enable informed choices to be made about gaming activities.
- Provide gaming patrons with a comprehensive understanding and awareness about treatment options and assistance available to them.
- Patrons adversely affected by gambling have access to timely and appropriate assistance and information.
- Individuals, communities, the gambling industry and the Government have a shared understanding of responsible gambling practices.

¹ Gaming licensees will be participants in meeting research objectives; they will not be solely responsible. The Gaming Act requires that the Commission establish an “annual research agenda” in order to understand the social and economic impacts of expanded gaming in the Commonwealth. Research grantees are envisioned to collaborate with gaming operators, governmental agencies, and others to meet research objectives.
Strategies

The Responsible Gaming Framework commits the MGC licensees to implement and adhere to responsible gambling strategies, with a particular focus on prevention and customer protection practices.

The Responsible Gaming Framework is organized into the following broad strategies:

1. Commit to corporate social responsibility
2. Encourage personal responsibility
3. Protect vulnerable groups
4. Ensure responsible marketing
5. Contain high-risk financial transactions
6. Engage the community

Each strategy contains a number of related responsible gaming practices. MGC licensees are responsible for ensuring their commitment with the relevant practices. Each licensee will maintain records relating to the practices in the Responsible Gaming Framework.

The Responsible Gaming Framework, strategies and practices, will be monitored and evaluated regularly for effectiveness and fidelity by MGC licensees. Where appropriate, minimum standards may be developed and codified into regulation.

It is anticipated that responsible gaming strategies and practices will continue to evolve in response to innovation and new evidence related to problem gambling and responsible gambling. Correspondingly, the MGC Responsible Gaming Framework strategies and practices will be periodically reviewed and revised.
Strategy 1: Commit to Corporate Social Responsibility

Each casino and slot parlor licensee will develop a Responsible Gaming Policy and a Responsible Gaming Plan (see Supporting Documents). These documents will be specific to licensee operations in order to:

- Assist in creating an environment that meets the needs of all customers, while maintaining a particular focus on those customers and their family members who are adversely affected by problem gambling behavior. Educate all employees on problem gambling and responsible gaming practices to help prevent gambling-related problems and to enhance early recognition of gambling-related problems in their customers, and to address and support them. (See Appendix A).

- Ensure that an appropriate level of awareness relating to responsible gaming is maintained throughout the licensed organization and key contractors, so that Responsible Gaming is made an integral part of daily operations.

- Provide all employees with information on the Responsible Gaming Plan through appropriate communication channels.

- Provide employees with clear statements of expectations and responsibilities including the requirement that each employee sign a Code of Conduct that fosters fair and ethical business practices.

- Designate responsible gaming duties for senior management and other leadership positions.

- Assure effective implementation property-wide, conducting internal audits, surveying employees, and reviewing relevant data, on a regular basis, with a responsible gaming committee.

- Detail a systematic approach to measuring and reporting on the licensee’s commitments, actions and progress on responsible gaming practices and report progress to relevant internal and external stakeholders.
Strategy 2: Enhance Personal Responsibility

• Informed Decision Making

Licensees have a responsibility to ensure that patrons have the information they need to make decisions and to minimize the risk that their patrons will lose control of their gambling. Gaming providers will execute programs and practices guided by the most current Informed Decision Making Framework as developed and published by the Responsible Gambling Council’s Centre for the Advancement of Best Practices.

The Informed Decision Making framework proposes three separate information programs aimed at three different types of gamblers: Casual, Frequent, and Intensive. Information received by the players includes: Information about the dangers of excessive gambling and how to avoid them; resources for help-seeking; information about how games really work; education regarding common misconceptions that encourage false beliefs about the probabilities of winning; and expenditure information through cost-of-play calculator tools and actual expenditures as captured on player cards.

Information guided by the Informed Decision Making Framework will be made available through a variety of practices and methods including utilization of gaming platforms and Responsible Gaming Information Centers (RGIC).

• Gaming platforms will enable players with readily accessible information. Features may include:
  - Information about the statistical odds of winning,
  - Average cost-of-play calculations,
  - Actual statements of expenditure/play history,
  - Self-assessment of gambling behavior,
  - Alerts each 30 minutes of play, and
  - Alerts when variable dollar amounts have been lost

• Responsible Gaming Information Center

Each gaming establishment will provide complimentary on-site space for an independent substance abuse and mental health counseling service. The Responsible Gaming Information Center (RGIC) will be centrally located in relation to the gaming area of a gaming establishment. The RGIC will provide patrons with an opportunity to gather information about the risks and responsibilities of gambling and speak directly with a qualified individual about specific questions and concerns about their or someone else’s gambling behavior. RGIC’s may include the following:

  - An interactive kiosk with information and resources to assist patrons in making informed gambling decisions.
  - Information and brochures that supports personal responsibility and informed decision making.
  - On-site staff during peak hours to address specific concerns and questions and provide direct linkage to self-help resources, counseling services, and other ancillary services.
- Assistance patrons with the self-exclusion application process.

**Pre-Commitment Tools**

Limit-setting or pre-commitment allows players to decide what they intend to spend in advance and thereby reduce the chance that they will overspend their pre-set limits. Licensees will make pre-commitment tools available to patrons and set programs and practices in place to reinforce patron use of pre-commitment tools.

**Self-Exclusion**

Licensees will facilitate a process that allows a person to be banned from gaming establishments and to be prohibited from collecting any winnings, recovering any losses, or accepting complimentary gifts or services or any other thing of value from the banned establishments. Gaming losses by a banned individual and winnings forfeited by a banned individual will be placed in the Gaming Revenue Fund.

Licensees will facilitate the exclusion of individuals from identified gambling venues by patrons that self-exclude. The licensee will ensure that every inquiry by a customer about self-exclusion is responded to in a respectful, timely and discreet manner.

The practice will include:

- Provision of translation service during the application process, if requested;
- Provision for timely referral to, or liaison with, a problem gambling treatment specialist;
- Removal of self-excluded individuals from marketing lists;
- Procedures to ensure, to the extent reasonably possible, that excluded customers are not allowed to enter, or remain in, properties from which they have been excluded.
- Provision to connect the applicant with information about gambling disorders, self-guided help or counseling services with a clinician approved by the Massachusetts Department of Public Health

Prior to the removal of a person’s name from the self-exclusion list they must complete an exit session conducted by a designated agent. The exit session will include a review of the risks and responsibilities of gambling, budget setting and a review of problem gambling resources should the individual wish to seek them.
Strategy 3: Protect Vulnerable Groups

- **Restrict Access to Gambling by Underage Persons**
  - Licensees must have and put into effect policies and procedures designed to prevent persons under the age of 21 from gambling;
  - Persons under the age of 21 are prohibited from designated gambling areas;
  - Licensees must monitor the effectiveness of policies to prevent underage gambling;
  - Licensees must take all reasonable steps to ensure that all staff understands their responsibilities for preventing underage gambling.

- **Monitor Premises for Unattended Children**
  Licensees will establish protocols and practices to safeguard children from neglect or abandonment when a child is brought to the licensee’s property by a casino patron. Practices will include monitoring premises and motor vehicles parked within licensee’s grounds.

- **Disallow Tobacco Use in Gaming Establishments**
  In order to reduce the well-known health risks associated with smoking and second-hand smoke, licensees will disallow the smoking of tobacco products in gaming establishments.

- **Minimize Alcohol Abuse**
  Alcohol has a disinhibiting effect on gambling behavior. Licensees will incorporate policies and practices to prevent intoxicated persons from gambling, including:
  - Remove visibly intoxicated persons from the gaming floor;
  - Train of beverage servers, security, valet attendants and other personnel to minimize the hazards of potentially intoxicated patrons the following restrictions on alcohol serving:
  - Restrict the sale of alcohol to visibly intoxicated persons;
  - Prohibit the distribution of alcoholic beverages between the hours of 2:00a.m. and 8:00a.m;
  - Disallow the distribution of free alcohol outside of the gaming area.

- **Reinforce Responsible Play with Play Tracking and Behavior Analytics**
  Player Cards, also referred to as Reward Cards, have significant potential to promote responsible gaming if used to reward responsible play. Licensees will incorporate the following practices into their player card program:
  - Players may receive points up to a $400 daily level of spending, beyond which they receive no points.
  - Players may receive points for opting to utilizing pre-commitment tools.
  - Players do not receive points for play that exceeds their pre-commitment levels.
  - Players receive bonus points for playing within their pre-commitment levels.

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2 The term ‘vulnerable’ groups can relate to different aspects of society, but in these standards means those who are below the age of legal play, those who already have a gambling problem, and/or those who are not aware of the risks associated with gambling.
Players receive points for opting to view educational resources.
Players receive a statement of expenditure outlining amount wagered, amount won and lost and net win or lose.
Players receive alerts when behavioral data suggests “at-risk” play.

- Third Party Exclusions

In an effort to protect individuals who manifest a severe gambling disorder and are unable or unwilling to ban themselves from a Licensee’s property, the MGC will establish a process that enables third party exclusions. Licensees will facilitate the exclusion of individuals who are banned from gaming properties by an entity other than the banned individual.3

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3 The MGC will establish detailed regulations and processes for third party exclusion at a later date.
Strategy 4: Ensure Responsible Marketing

Licensees shall adopt the MGC ‘advertising and marketing code’ which is a set of guidelines for marketing and communication practices designed to promote responsible gaming and problem gambling awareness signage requirements (see Appendix B). Elements of the advertising and marketing campaign shall include:

- Responsible gaming materials and information provided by MGC
- Encouragement to ‘know your limits’ or ‘gamble responsibly’.
- Warnings about the potential addictive nature of gambling.
- Identification of the signs/symptoms of problem gambling.
- Information about where people can go for help including the on-site services.
- Provision of the true mathematical odds of various gambling activities.
- Efforts to dispel common gambling fallacies and erroneous beliefs.
- Provision of guidelines and suggestions for problem-free gambling.
- Information about the voluntary self-exclusion and credit restriction programs.

Responsible gaming signage and information must be available at each location where gambling is taking place, must prominently publicize the Massachusetts Problem Gambling Helpline and promote the state subsidized problem gambling treatment and services. The display of responsible gambling material at places where gambling takes place in MGC licensee venues is detailed in Appendix B.
Strategy 5: Contain High-Risk Financial Transactions

- **Financial Transactions**
  Licensees shall develop a policy that ensures all legislative requirements relating to check cashing, payment of winnings and financial transactions are implemented.

- **House Credit**
  The banning of house credit is considered a responsible gaming best practice. Those licensees choosing to offer house credit shall utilize the following guidelines:
  - House credit will only be extended to qualified patrons as determined by a FICO score above 700 or other MGC approved method;
  - The granting of house credit is limited to $500 per day, with a $1,500 maximum balance, for qualified patrons at MA licensed gaming facilities;
  - Procedures must be in place that inform and allow patrons to place themselves on a voluntary credit suspension list which will be maintained by MGC.

- **Automatic Teller Machines (ATM)**
  The banning of ATMs from gaming venues is considered a responsible gaming best practice. Those licensees choosing to offer ATM services shall not locate them within 100 feet of the gaming area of a licensee’s gaming establishment.

- **Personal Check Cashing**
  - Licensees must verify a sufficient account balance exists or obtain an authorization from a check verification and warranty service before cashing any check;
  - Checks must be currently dated, and not postdated;
  - Must be drawn from a personal account which the patron has authority to draw from;
  - Third party check cashing is prohibited.
  - Any check cashed must be deposited within 24-hours.

- **Credit Cards**
  - Gambling with borrowed money is considered a high-risk gambling behavior. Credit card cash advances are limited to $500 per day;
  - Credit cards may not be used to fund cash gaming reserves housed by licensees.

- **Payment Acceptors on Electronic Gaming Machines**
  Credit card and debit card acceptors may not be placed on the gaming machine platform.
Strategy 6: Engage the Community

Licensees shall actively engage with the community, which includes local problem gambling service organizations, treatment centers and/or health professionals in order to understand how to better help individuals experiencing gambling problems access treatment and sustain recovery. Licensees shall:

- Establish a customer complaint resolution process.
- Develop links between the licensee and relevant community organizations that will provide support and information for individuals experiencing problems and their families.
- Regularly engage with problem gambling and responsible gaming stakeholders formally and informally and include engagement activities in reporting mechanisms to the MGC.
- Provide opportunities for stakeholders to voice relevant concerns or questions. Licensees shall integrate the results of stakeholder engagement into their strategic decision-making processes and shall offer feedback to relevant stakeholders.
- Designate space within casino property to serve as office for private meetings between patrons with concerns related to their gambling and counselors or other staff trained in crisis intervention, mental health triage, and/or the facilitation of a self-exclusion process. Designate space within the casino property for a Responsible Gaming Information Center (RGIC).
Supporting documents

**Responsible Gambling Plan**

Each gaming licensee will develop a Responsible Gambling Plan. This document will be specific to their operations to:

- Assist in creating a responsible gambling environment that meets the needs of customers, with a particular focus on the customers and their families who are adversely affected by problem gambling behavior.
- Provide clear statements of responsibilities for their staff.
- Give consideration to the needs of their local communities with a particular focus on any geographic and cultural issues.

**Responsible Gambling Policy**

Each licensee will develop a Responsible Gambling Policy or augment their existing Responsible Gambling Policy to reflect the following principles. The licensee will:

- Respect the customers' rights to privacy.
- Support the continued maintenance of the MGC Responsible Gaming Framework.
- Take reasonable and balanced measures to meet revenue objectives while protecting the interests of customers and vulnerable groups.
- Ensure practices and procedures reflect a combination of government regulations, operator self-regulation and individual responsibility.
- Develop practices concerning responsible gaming-related issues on the fullest possible understanding of relevant information and analysis of documented research.
- Work with stakeholders – including governments, non-governmental organizations, regulators, researchers, public health professionals, and the general public – to share information, develop research and promote responsible gaming as broadly as possible, and encourage a better understanding of the social impact of gaming.
- Promote only legal and responsible gaming in all aspects of their activities, including the development, sale and marketing of their products and activities; and will make reasonable efforts to ensure their agents do the same.
- Provide the public with information in an accurate and balanced manner to enable individuals to make informed choices about gaming activities within their properties.
- Make a reasonable effort to monitor, test, and revise as appropriate, those activities and practices related to responsible gaming. Publicly report findings.
Glossary of terms

Responsible gaming
The provision of gambling services in a way that seeks to minimize the harm to customers and the community associated with gambling.4

Gambling
Gambling involves staking money on uncertain events driven by chance or a combination of chance and skill. The major forms of gambling are wagering and gaming.

Problem gambling
Problem gambling is characterized by difficulties in limiting money and/or time spent on gambling which leads to adverse consequences for the gambler, others, or for the community.

Gambling disorder
Medical term for an individual exhibiting persistent and recurrent maladaptive gambling behavior that disrupts personal, family, and/or vocational pursuits.

Credit
“Credit” means allowing any person any length of time in which to make payment or otherwise honor a financial obligation, whether express or implied in any particular and includes lending of cash or cash equivalent. Checks, markers, promissory notes, IOWs or similar transactions or instruments constituting a memorandum of debt accepted for purposes of participating in limited gaming are credit instruments. “Credit” does not apply to pre-paid magnetized strip cards used in lieu of cash, chips, or tokens.

Advertising and marketing
Advertising and marketing are defined to include, but are not limited to, radio and television broadcast off the premises, print, direct mail, billboard, and Internet promotions.

4 Australian Institute for Gambling Research
Acknowledgements

The MGC sought input to this responsible gaming framework from a number of experts during a Responsible Gaming Forum held on October 28, 2013 and in subsequent consultation. This advisory group was composed of the following professionals:

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- Mr. Keith Whyte

The MGC recognizes the Massachusetts Council on Compulsive Gambling for playing a key role in the development of the MGC Responsible Gaming Framework.

The following documents informed the development of the MGC Responsible Gaming Framework.

- National Gambling Impact Commission Report
- Adelaide Casino Responsible Gambling Code of Practice (South Australia)
- European Responsible Gambling Standards
- The World Lottery Association Responsible Gaming Framework
- United Kingdom Gambling Commission, Gambling Codes of Practice
- Western Cape Industry Code of Conduct to Promote Responsible Gambling
 Responsible Gaming Framework

- The American Gaming Association, Responsible Gaming Statues and Regulations, 2008
- Game Sense: Changing the Channel on Responsible Gaming, January, 2014
- Responsible Gaming Council, Centre for the Advancement of Best Practices, INSIGHT, Informed Decision Making, 2010
Appendix A: Staff Training

(1) The Licensee will provide training for employees about responsible gaming with focus on promoting a responsible gaming environment for patrons and education for employees about problem gambling and resources for employees in need of assistance. Licensee will:

(a) ensure that all staff receive problem gambling training, provided at four distinct levels—
   (i) for all staff at induction—training which provides basic information on responsible gaming, problem gambling, regulations, and resources (1.5 hours); and
   (ii) for staff whose evaluation responses to the one hour training indicated further training was needed, enhanced responsible gambling training (2 hours); and
   (iii) for all supervisors within the Gaming, Food and Beverage, Security, Surveillance, and Human Resource departments—training identifying initial procedures for first level identification, and referral, of customers and supervised staff requiring assistance (4 hours); and
   (iv) for appropriate senior employees—advanced training on the identification of, and intervention techniques for, problem gambling, including facilitation of the self-exclusion process (8 hours);

(b) provide refresher courses for all staff at least each year;

(c) include responsible gambling information in employee newsletters and magazines; and

(d) display responsible gambling material in back of house areas to remind staff of policies and their responsibilities.

(2) If the Licensee is to use an external provider for training, that training provider must be appropriately accredited in a manner acceptable to the Massachusetts Gaming Commission.

(3) Responsible gaming training programs will be designed to—

(a) provide information about the potential effect of gambling on customers; and

(b) include information on the recognition and identification of problem gambling traits; and

(c) ensure that the processes for approach, intervention, referral and follow-up are clear and well understood.

(4) The Licensee will ensure that problem gambling training programs are regularly reviewed and revised.

(5) The Licensee will:

(a) make arrangements to ensure that training programs provided to its staff are the subject of an annual audit of their compliance with the requirements of this code; and

(b) provide a report of the outcome of each audit to the MGC within 28 days after completion.

(6) The Licensee will take reasonable steps to ensure that staff with a potential or actual gambling problem are identified and referred for treatment.

(7) If the Licensee provides training through an appropriately accredited external provider, the Licensee may comply with sub-clauses (3), (4), and (5) through the activities of that external provider.

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5 Adapted from the Adelaide Casino Responsible Gambling Code of Practice (South Australia)
Appendix B: Advertising and Marketing Code

The purpose of these guidelines are three-fold:

1) To ensure responsible and appropriate advertising and marketing of casinos to adults that reflects generally accepted contemporary standards; and
2) To avoid casino advertising and marketing materials that specifically appeals to children and minors.
3) To provide guidance on the display of responsible gambling material at places.

GENERAL GUIDELINES

- All advertising and marketing will contain a responsible gambling slogan and the toll-free telephone number for those individuals in need of assistance.
- Advertising and marketing materials are intended for adults who are of legal age to gamble in gaming establishments casinos.
- Advertising and marketing materials should reflect generally accepted contemporary standards of good taste.
- Advertising and marketing materials should not imply or suggest any illegal activity of any kind.
- Advertising and marketing materials shall strictly comply with all state and federal standards to not make false or misleading claims or exaggerated representations about gambling activity.
- Advertising and marketing materials should not contain claims or representations that individuals are guaranteed social, financial, or personal success.
- Advertising and marketing materials should not feature current collegiate athletes.

UNDERAGE GUIDELINES

- Advertising and marketing materials directed to or intended to appeal to persons below the legal age are prohibited.
- Advertising and marketing materials should not contain cartoon figures, symbols, celebrity/entertainer endorsements, and/or language designed to appeal specifically to children and minors.
- Gambling activities should not be advertised or promoted by anyone who is or appears to be below the legal age to participate in gambling activity. Models or actors should appear to be 25 years of age or older.
- Gambling should not be advertised or promoted in media specifically oriented to children and/or minors.
- Advertising and marketing should not be placed in media where most of the audience is reasonably expected to be below the legal age to participate in gambling activity.
- Where reasonably possible, advertising and marketing materials should not appear adjacent to or in close proximity to comics or other youth features.
• Gambling activities should not be advertised to or promoted at any U.S. venue where most of the audience is normally expected to be below the legal age to participate in gambling activity.

• Unless in response to a charitable request, clothing, toys, games, or other materials that appeal primarily to children or minors should not be given away at events where most of the audience is reasonably expected to be below the legal age to participate in gambling activity.

• Participation in gambling activities should not be promoted on college or university campuses or in college or university publications. Gambling activities should not be advertised or promoted on billboards or other outdoor displays that are adjacent to schools or other primarily youth-oriented locales.

DISPLAY OF RESPONSIBLE GAMING MATERIAL GUIDELINES

Responsible gaming signage and information must be available at each location where gambling is taking place, must prominently publicize the Massachusetts Problem Gambling Helpline and promote the use of responsible gaming and state subsidized problem gambling treatment and counselling services. Consideration in messaging should be given to ensure people from linguistically diverse backgrounds have access to messaging.

Method:

• Responsible gaming posters must be displayed in full view of gambling customers, as well as in staff areas as applicable.

• Video systems, where applicable, must periodically display the relevant information with regard to the helpline.

• Responsible gaming and problem gambling treatment messaging must be available in guestrooms, lounges, and other public areas.

• Responsible gaming and problem gambling treatment messaging must be available at the gambling point of sale, being casino tables, racing cashier desks, and so on.

• Problem gambling helpline details must appear on all gaming machines, including slot machines, either on a sticker or displayed on the machine screen.

• Responsible gaming and problem gambling treatment messaging must be available at all cash desks, information desks, and club desks, and anywhere else at a gambling establishment where guests and customers are to be found.

• ATM machines in or adjacent to places where gambling is conducted should have problem gambling helpline stickers, and periodic on-screen responsible gaming messages.