



Massachusetts Gaming Commission

RFA-2 Application Review

Category 1 License for Casino: Region C – Mass Gaming & Entertainment

Report to the Commissioners for: Category # 3 - Economic Development

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1. Introduction

Category 3 encompasses the Economic Development aspects of the Applicant proposals specifically the areas of job creation, support of external business and job growth, and regional tourism and attractions.

Main Criteria

Category 3 is comprised of 3 Criteria divided into three sections that parallel the Application form:

- **Criterion 1 (Questions 1 to 13) addresses Job Creation and is further broken into:**
 - HR practices and employment including number of employees (Q2), affirmative action (Q7), HR practices (Q9), employee retention (Q12) and ethnic diversity (Q13).
 - Workforce development including hiring and training (Qs 3, 4, 5, 6 and 8).
 - Labor relations including organized labor contracts and labor harmony (Qs 10 and 11)

- **Criterion 2 (Questions 14 to 23 and 30) addresses Support for External Businesses and Job Growth and is further broken into:**
 - Local business promotion and support (Qs14 and 18) as well as use of local suppliers (Q15 and Q16), assisting businesses to understand needs (Q17), and quantum of vendor supplied goods (Q19).
 - Support of Minority-, Women-, and Veteran-Owned Businesses (Q20)
 - Regional impact including the projected benefit for regional businesses (Q21) and coordination with the regional economic plan (Q23 reassigned from the Regional Tourism and Attractions section)
 - Domestic gaming equipment including the purchase of domestic slot machines (Q22) and identification of gaming equipment vendors (Q22).

- **Criterion 3 (Questions 24 to 29 and 31 to 33) addresses Regional Tourism and Attractions and is broken into two subcategories:**
 - Tourism and regional promotion and marketing including local agreements to expand gaming establishment draw (Q24), cross marketing (Q25), collaboration with tourism/other industries (Q26), international marketing (Q27), past record of success (Q32).
 - Other amenities, enhancements and strategies including amenities beyond the core casino project (Q28), unique business and marketing strategies (Q29), other community enhancements (Q30) and entertainment/athletic events (Q32).

Rating System

Color coding and rating explanation:

INSUFFICIENT	Failed to present a clear plan to address the topic, or failed to meet the minimum acceptable criteria of the Commission.
SUFFICIENT	Comprehensible and met the minimum acceptable criteria of the Commission; and/or provided the required or requested information.
VERY GOOD	Comprehensive, demonstrates credible experience and plans, and /or excels in some areas.
OUTSTANDING	Uniformly high quality, and demonstrates convincing experience, creative thinking, innovative plans and a substantially unique approach.

Question List

- 3-1 Studies and Reports
- 3-2 Employees
- 3-3 Massachusetts Community College Workforce Training Plans
- 3-4 Job Opportunities and Training for Unemployed and Underemployed
- 3-5 Experience with Hiring Unemployed and Underemployed
- 3-6 Plan for Workforce Development
- 3-7 Affirmative Action Plan
- 3-8 Workforce Development
- 3-9 HR Practices
- 3-10 Organized Labor Contracts
- 3-11 Organized Labor Contracts Operations
- 3-12 Employee Retention Record
- 3-13 Ethnic Diversity
- 3-14 Local Business Promotion
- 3-15 Local Suppliers (Construction)
- 3-16 Local Suppliers (Operations)
- 3-17 Assisting Businesses
- 3-18 Promoting Regional Businesses
- 3-19 Vendor Supplied Goods
- 3-20 Minority, Women, and Veteran Businesses
- 3-21 Projected Benefit for Regional Businesses
- 3-22 Domestic Slot Machines
- 3-23 Regional Economic Plan Coordination
- 3-24 Local Agreements
- 3-25 Cross Marketing
- 3-26 Collaboration with Tourism and Other Industries
- 3-27 International Marketing Efforts
- 3-28 Other Amenities
- 3-29 Unique Business and Marketing Strategies
- 3-30 Other Community Enhancements
- 3-31 Record of Success
- 3-32 Entertainment and Athletic Events

2. Overall Rating (Provisional)

Introduction

The RFA-2 review process consisted of a review of the applications and supporting documents by individual reviewers, presentations by the Applicants and questions by the Commission at public hearings, public input, review of background material prepared by subject matter experts, and group meetings to discuss individual reviews, culminating in the preparation of a provisional ratings report. The review process was augmented by field visits to a sample of the Applicant's existing operations as well as reference calls.

The reviewers consisted of the following:

- MGC staff—Jill Griffin, Director of Workforce, Supplier and Diversity Development
- Independent Evaluators –Lynn Browne (past Director of Economic Research for the Federal Reserve Bank of Boston), Patrick B. Moscaritolo (CEO and President, Boston Convention and Visitors Bureau), Nancy L. Snyder (President and Chief Executive Officer, Commonwealth Corporation)
- Subject Matter Experts/Consultants – Lyle Hall (HLT Advisory Inc.), Adam Black (HLT Advisory Inc.)

Brockton | MG&E

As an overall comment, Applicant provided reasonable detail on achievements at existing casinos in other jurisdictions—across all three economic development focus areas—but failed to sufficiently elaborate on specific plans, targets and intentions for the Brockton project.

Within the Job Creation area, Applicant quantified employment from both construction and ongoing operations. Applicant’s anticipated salaries and wages, on a \$/FTE basis, are lower than Category 1 casinos approved in Regions A and B, depending on market conditions and availability of qualified workforce some challenges may occur in filling all positions at these pay scales. Projected benefits are consistent with projected compensation.

The discussion of job opportunities for the unemployed and underemployed lacked targets or clear delineation of plans and activities. Similarly the section on workforce training was inadequate, failing to identify host community colleges or other vehicles for delivery of training. However, the Applicant demonstrated success in both these areas at their Pittsburgh, Philadelphia and Des Plaines casinos.

Employee retention rates at existing casinos, and expected rates at the Brockton project, are reasonably low (i.e., high turnover) when compared to industry averages as well as rates proposed by other Category 1 applicants.

Applicant provided a description of the vendor outreach process for operational goods and services. Applicant also sufficiently addressed plans for promoting local and regional businesses although more could have been done to identify specific businesses and how these businesses might be better involved. No detail was provided on vendor outreach for construction.

With respect to vendor diversity targets, Applicant failed to identify targets for MBE/WBE/VBE participation and provided insufficient discussion on building awareness, strategies for involvement and development, joint ventures and mentorships, monitoring process, and project operations training with respect to MBE/WBE/VBE.

Applicant views the Brockton casino’s primary market as the greater Boston area as evidenced by the tourism-oriented marketing initiatives described in the Application. Aside from agreements with neighboring facilities (Campanelli Stadium, Shaw’s Center) few other formal arrangements have been put in place (for the most part, the Application even fails to identify regional tourism marketing entities or tourism operators) . These marketing initiatives reflect an entirely local/regional casino positioning.

Similarly with the job creation and small business sections, the Applicant’s description of achievements at other casinos is far more thorough than the plans for Brockton. The Applicant demonstrated a reasonable linkage to the regional economic plans (e.g. Brockton 2025) and commitment to non-competition with local entertainment venues.

3. Criteria Rating Summary

Criterion 1: Job Creation	
Criterion 1 Rating	Sufficient
	Overall, sufficient rating for job creation. MG&E demonstrated limited effort in tailoring HR practices and workforce development plans to the local market. However, MG&E indicated affiliated properties track record of executing local market engagement, hiring underemployed/unemployed, community college partnerships, and providing the means for workforce development – providing a sense of confidence that MG&E can execute similar efforts at a Brockton casino.

Criterion 1: Grouping of Questions by Similarity	
Group 1 Rating	Sufficient
Group 1 - HR practices and employment (Questions 2, 7, 9, 12 and 13)	<ul style="list-style-type: none"> • Modest job creation from construction (2,033 FTEs) and ongoing operations (1,477 FTEs –YR 1) with full-time employees representing approximately 80% of employees. • Payroll (without benefits) for ongoing operating FTEs (\$28,935/FTE – YR 1). • Formal diversity plans not fully developed for the local community. Affiliated properties have track record of establishing and executing diversity plans. MG&E intends to execute a similar diversity plan in Brockton. • History of diverse hiring practices (53% minority in Philadelphia, 28% in Pittsburgh, 56% in Des Plaines). • Comparatively weak retention rates at affiliated properties with similar rates projected for the Brockton facility.
Group 2 Rating	Insufficient/Sufficient
Group 2 - Workforce development (Questions 3, 4, 5, 6, 8)	<ul style="list-style-type: none"> • General approach regarding workforce development with little in terms of formal commitments. • Applicants workforce development emphasis came in relation to affiliated properties track record and intentions to replicate their strategies and success –insensitivities to local market through lack of tailored plans. • Despite lack of local emphasis, affiliated properties have proven track record in engaging local markets and providing opportunities for advancement – assume MG&E would replicate efforts in Brockton.
Group 3 Rating	Sufficient
Group 3 - Labor relations (Questions 10 and 11)	<ul style="list-style-type: none"> • Working draft of MOU completed with BABCTC. • Affiliated facilities have limited union representation in mostly support areas (facilities) - no estimates provided for Brockton. • Some controversy over union certification/labor practices in Pittsburgh, Des Plaines and Philadelphia.

Criterion 2: Supporting External Business and Job Growth	
Criterion 2 Rating	Sufficient
	Overall a sufficient rating for Supporting External Business and Job Growth. MG&E has displayed intentions to integrate and engage the surrounding businesses and create job growth. The Application lacked specific, detailed plans for the Brockton market and largely described the track record at other properties as proof of intent.

Criterion 2: Grouping of Questions by Similarity	
Group 1 Rating	Sufficient
Group 1 - Local Business Promotion and Support (Questions 14, 15, 16, 17, 18 and 19)	<ul style="list-style-type: none"> Lacked local specifics and detailed plans to promote businesses, however, stated intentions to partner with local organizations and committed capital (\$50k/annum) to purchase local business gift cards for rewards program. Cooperation agreement signed with Brockton 21st Century (owner of The Shaw's Center and Campanelli Stadium). Delegated local supplier integration into the construction phase to general contractors and construction management firms. Outlined plans to replicate strategies at affiliated properties to engage local vendors through vendor fairs and maintain local vendor database. Showed greater consideration by listing suggested locations and earmarked hiring funds. Identified opportunities for local businesses to be integrated into the casino and the casinos' ability to bring traffic to the region. Affiliated properties have proven track record of purchasing goods and services from local businesses with MG&E outlining modest committed funds for local enterprises.
Group 2 Rating	Insufficient
Group 2 - Support of Minority-, Women-, and Veteran-Owned Businesses (Question 20)	<ul style="list-style-type: none"> Failed to identify specific goals to engage minority, women, and veteran-owned businesses. Affiliated properties have track record of modest MWVBE spending.
Group 3 Rating	Sufficient/Very Good
Group 3 - Regional Impact (Questions 21 and 23)	<ul style="list-style-type: none"> Modest projections for spin off spending with plans to link local businesses with rewards program. MG&E plans are aligned with the City of Brockton's economic development plans and financial commitments from MG&E should bolster municipal efforts.
Group 4 Rating	Sufficient
Group 4 - Domestic Gaming Equipment (Question 22)	<ul style="list-style-type: none"> Applicant demonstrated sufficient evidence of fulfilling domestic gaming equipment suppliers.

Criterion 3: Regional Tourism and Attractions	
Criterion 3 Rating	Sufficient
	Overall sufficient rating for Regional Tourism and Attractions although the applicant clearly positions the Brockton project as a “local resident” casino. Displayed relative strength in identifying potential local/regional business partnership opportunities and intentions to collaborate and engage the appropriate tourism/economic agencies, however, lacked robust formal displays of communication/agreements with potential partners. MG&E has committed impactful levels of funding and identified alignment with the city/regions goals of development and overall advancement.

Criterion 3: Grouping of Questions by Similarity	
Group 1 Rating	Sufficient
Group 1 - Tourism and Regional Promotion and Marketing (Questions 24, 25, 26, 27, 29 and 31)	<ul style="list-style-type: none"> • Demonstrated intentions to partner with local venues and tourism/economic organizations (ie. Cooperation agreement with Brockton 21st Century). However, lacked specifics and initiative for formal partnerships and reliance on Boston and area tourism marketing entities and products; little knowledge demonstrated of Brockton/Plymouth County. • Highlighted affiliated properties previous marketing strategies with intentions to replicate efforts but lacked local specifics and uniqueness.
Group 2 Rating	Sufficient
Group 2 - Other amenities, enhancements and strategies (Questions 28, 30 and 32)	<ul style="list-style-type: none"> • Modest planning for non-gaming amenities however lack of mention for how the casino will use non-gaming amenities to attract and market to patrons. • Demonstrated commitment to aiding the local economy through community enhancement fee (\$3 million/annum – 5% of which goes to Brockton Community Foundation) and committed capital towards economic development and planning in Brockton. • Expressed intents to host entertainment and athletic events, however lacked sensitivity and due diligence towards the local market (i.e., Lack of emphasis on Brockton’s rich boxing history).

4. Review Detail

Criterion 1: Job Creation	
Criterion 1 Rating	Sufficient
	Overall, sufficient rating for job creation. MG&E demonstrated limited effort in tailoring HR practices and workforce development plans to the local market. However, MG&E indicated affiliated properties track record of executing local market engagement, hiring underemployed/unemployed, community college partnerships, and providing the means for workforce development – providing a sense of confidence that MG&E can execute similar efforts at a Brockton casino.

Criterion 1: Grouping of Questions by Similarity	
Group 1 Rating	Sufficient
Group 1 - HR practices and employment (Questions 2, 7, 9, 12 and 13)	<ul style="list-style-type: none"> • Modest job creation from construction (2,033 FTEs) and ongoing operations (1,477 FTEs –YR 1) with full-time employees representing approximately 80% of employees. • Payroll (without benefits) for ongoing operating FTEs (\$28,935/FTE – YR 1). • Formal diversity plans not fully developed for the local community. Affiliated properties have track record of establishing and executing diversity plans. MG&E intends to execute a similar diversity plan in Brockton. • History of diverse hiring practices (53% minority in Philadelphia, 28% in Pittsburgh, 56% in Des Plaines). • Comparatively weak retention rates at affiliated properties with similar rates projected for the Brockton facility.
Group 2 Rating	Insufficient/Sufficient
Group 2 - Workforce development (Questions 3, 4, 5, 6, 8)	<ul style="list-style-type: none"> • General approach regarding workforce development with little in terms of formal commitments. • Applicants workforce development emphasis came in relation to affiliated properties track record and intentions to replicate their strategies and success –insensitivities to local market through lack of tailored plans. • Despite lack of local emphasis, affiliated properties have proven track record in engaging local markets and providing opportunities for advancement – assume MG&E would replicate efforts in Brockton.
Group 3 Rating	Sufficient
Group 3 - Labor relations (Questions 10 and 11)	<ul style="list-style-type: none"> • Working draft of MOU completed with BABCTC. • Affiliated facilities have limited union representation in mostly support areas (facilities) - no estimates provided for Brockton. • Some controversy over union certification/labor practices in Pittsburgh, Des Plaines and Philadelphia.

3.1 Studies and Reports — Provide completed studies and reports showing the proposed gaming establishment's: (i) economic benefits to the region and the Commonwealth; (ii) impact on the local and regional economy, including the impact on cultural institutions and on small businesses in the host community and surrounding communities.	
Expectations of Applicant	<ul style="list-style-type: none"> • Massachusetts-specific and/or project specific (independent or company) studies and reports that address: <ul style="list-style-type: none"> ○ Job Creation <ul style="list-style-type: none"> ▪ Evidence (i.e., what Applicant is proposing specific to Mass or work done in other jurisdictions) demonstrating incremental employment? ○ Supporting External Business and Job Growth <ul style="list-style-type: none"> ▪ Creation of synergies and/or joint ventures with local businesses? ▪ Evidence of incremental employment? ▪ Evidence in incremental visitation? ○ Regional Tourism <ul style="list-style-type: none"> ▪ Evidence of incremental visitation to the host community (e.g., hotel room nights or similar measures)?
MG&E	
Overall Comments on all Application	Studies have been provided.
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • Not applicable to this question.
Existing and past practices supporting commitments	<ul style="list-style-type: none"> • Not applicable to this question.

3.2 Employees—State the number of employees to be employed at the proposed gaming establishment, including detailed information on the pay rate and benefits for employees, and describe how the applicant proposes to ensure that it provides a high number of quality jobs in the gaming establishment.

Expectations of Applicant	<ul style="list-style-type: none"> • Full-time versus Part-time positions? • Comprehensiveness of benefits for full and part time? • Description of types of positions and wage levels per position (number of management (salaried) versus hourly wage positions)? • Ratio of management to general staff (management and supervisory positions used as proxy for “quality” jobs)? • Comparison of average wage per FTE to Mass averages? • Locally hired employees versus “imported”?
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MG&E

Overall Comments on all Application: Applicant filled out the provided template detailing jobs, salaries, and benefits (payroll data is net of gratuities). Comparisons to other Category 1 casinos are also shown.

Application Commitments (e.g., targets, processes, plans)		MG&E	MGM	Wynn
	Construction Period:			
	FYEs	2,033	2,600	1,765
	Annual \$/FYE	\$46,905	\$55,550	\$117,280
	Operations (Year 1):			
	FTEs	1,477	2,350	3,287
	Annual \$ (without benefits)/FTE	\$28,935	\$36,484	\$41,418
	Mean Household Income	Brockton: \$61,096 (<i>Source: US Census Bureau–2010-2014 ACS</i>)	Springfield: \$47,677	Everett: \$62,335
	Benefits (Year 1):			
	Salary-to-benefit ratio	46.5%	43.1%	15.9%
	FTE benefits/employee	\$13,457	\$15,735	\$6,572
	FT benefits/employee	\$13,631	\$14,025	\$5,287
	PT benefits/employee	\$2,574	\$1,786	\$3,085
	Benefits breakdown as a % payroll (Further breakdown in Appendix A2 and A3)	Average of per FT/PT: Medical/Dental/Vision/Life/Disability (29.4%), Bonuses (6%), 401k (4%), paid-time-off (6.9%)	Per FTE: Medical/Dental (31.6%), 401k (2.8%), Employee Meals (7%), Tuition Reimbursement (0.2%), and Relocation & Awards (1.6%)	Medical/Dental/Life (4%), Employee Meals (4.5%), Bonus (4.1%), PTO (3%)
	Forecasted retention rate	Year 1-15: 72%-82%	Year 1: 80%, Year 2-5: 90%-95%	Year 1: 84.4%, Year 5: 86%
	Retention rate since Day 1 of operations (opening date)	[redacted]	[redacted]	[redacted]

	Union representation	<ul style="list-style-type: none"> • Other RSG facilities have union representation in support areas (facilities) - no estimates provided for Brockton • Some controversy over union certification <ul style="list-style-type: none"> ○ Pittsburgh, Des Plaines and Philadelphia 	Project 78.7% of FTEs to be union (74% full-time, 26% part-time), representing 66.3% of overall wages/benefits	Expecting 50% union rep., using LV as benchmark
Existing and past practices supporting commitments	<ul style="list-style-type: none"> • Average wages based off of affiliated casino experience and set competitively within the industry. • Full-time to part-time positions will be comprised similarly to other RSG casinos– where 87% of positions are full-time. 			
Rating	Sufficient			

3.3 - Massachusetts Community College Workforce Training Plans —Describe any plans the applicant has for working with the Massachusetts Community College Casino Careers Training Institute or other training organizations as the applicant trains and hires the staff for its facility and specifically its plans for staffing gaming positions with Massachusetts residents.	
Expectations of Applicant	<ul style="list-style-type: none"> Existing agreements in place with colleges/institutions (other jurisdictions and/or Mass)? Proposed legacy arrangements (i.e., any facilities, programs, etc. that will remain in community)? Examples of college/institution relationships in other jurisdictions? Examples of college/institution relationships specifically related to gaming and hospitality training? Examples of past experience staffing using employees that are locally trained and local residents?
MG&E	
Overall Comments on Application	No formal commitments made with specific community colleges in Brockton or the region; however, RSG casinos have demonstrated workforce training programs and have created affiliations with community colleges in their respective areas. MG&E will look to replicate this in Brockton with the surrounding community colleges.
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> Will look to partner with community colleges to develop gaming industry specific curriculums and train/create hiring processes for students. No specific community college training plans or partnerships were mentioned. MG&E will seek to build off of the existing RSG casino – community college partnership model. Need to customize plans to host community. MG&E will provide career opportunities to community college students by having local recruiting teams work directly with job placement services at each college. All full-time Team Members qualify for \$5,000 per Team Member per annum at accredited educational institutes for degree programs or vocational certificates.
Existing and past practices supporting commitments	<ul style="list-style-type: none"> Rivers Casino Des Plaines has an established relationship with Oakton Community College, whereby students are hired by the casino and casino employees can take classes at Oakton. Rivers Casino Schenectady is currently looking to establish a Casino & Gaming Management program with Schenectady County Community College - a sample course description was provided outlining the core curriculum components.
Rating	Insufficient/Sufficient

3.4 – Job Opportunities and Training for Unemployed or Underemployed – With respect to employment opportunities at the proposed gaming establishment, outline the strategy as to how the Applicant will focus on job opportunities and training in areas and demographics of high unemployment and underemployment.	
Expectations of Applicant	<ul style="list-style-type: none"> • Are there internal programs/systems in place in other jurisdictions? • Is there evidence of contact and/or arrangements with local career centers? • Quantification of jobs earmarked for unemployed/underemployed? • Proportion of available jobs earmarked for unemployed/underemployed (i.e., have specific targets been set; how will targets be measured)?
MG&E	
Overall Comments on Application	The applicant cited past experiences where RSG casinos partnered with local groups to inform, then hire, the underemployed/unemployed. MG&E stated they would replicate a similar model in Brockton to engage the underemployed/unemployed. All RSG casinos were opened/operate in areas of high unemployment.
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • MG&E has earmarked ~\$1.3 million/year for activities such as training and recruitment. Additionally, MG&E has budgeted \$11.9 million for pre-opening activities such as salary/wages, recruiting and training. • Referred to job opportunities created at other affiliated casinos, stating the Brockton Casino will similarly partner with local groups/agencies to reach and involve the unemployed/underemployed community for staffing needs. <ul style="list-style-type: none"> ◦ Brockton unemployment rate (9.1%) higher than state average (5.7%) (Source: US Census Bureau, 2010-2014 American Community Survey). • References plans to meet with and partner with local job training organizations and will form partnerships to ensure education and training are provided (mention helping train applicants in resume writing, interviewing skills, and identifying what MG&E is looking for). • MG&E will advertise job positions and host large-scale recruiting events (citing the Massasoit Community College Conference Center or the Shaw's Center as potential event sites) to attract a large applicant base. Selected candidates will have panel based interviews for the first round and a second round of interviews will be held for successful candidates. Departmental need, fit, and previous experience are all considered in the selection process. Before offers are sent, HR conducts background checks. New hires then complete licensing requirements and new hire orientation/training.
Existing and past practices supporting commitments	<ul style="list-style-type: none"> • SugarHouse worked with local groups to identify & inform underemployed/unemployed individuals of job opportunities - 35% of employees at SugarHouse were previously unemployed. • Rivers Casino Pittsburgh and Des Plaines also connected with community groups/organizations to reach the underemployed/unemployed population to staff the facilities (eg. Rivers Pittsburgh partnered with Northside Leadership Council, Pennsylvania CareerLink, and Rivers Des Plaines partnered with Cara Program, RefugeeOne, Anixter Center, to name a few examples). • Applicant has experience opening casinos in new gaming markets citing 80% of hires in Pittsburgh were new to the industry. • Rivers Casino Schenectady is currently replicating the efforts of affiliated casinos.
Rating	Insufficient/Sufficient

3.5 – Experience with Hiring Unemployed and Underemployed – With respect to employment opportunities at the proposed gaming establishment, describe the Applicant's past approaches to and experiences with hiring in areas and demographics of high unemployment and underemployment in other jurisdictions. Examples should be provided within the last 5 years.	
Expectations of Applicant	<ul style="list-style-type: none"> • Evidence of past experience in other jurisdictions with hiring unemployed/underemployed? • Length (years) of experience in hiring unemployed/underemployed? • Programs in place with career/job creation centers? • How to consider those in jurisdictions without unemployed/underemployed • What has Applicant done in other jurisdictions (and does the Applicant propose to do in Mass)? • Measures of how programs have worked?
MG&E	
Overall Comments on Application	Applicant cited previous experiences with RSG casinos where they have extensively partnered with local groups to identify and inform underemployed/unemployed populations about job opportunities
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • Not applicable – question directed towards past experience.
Existing and past practices supporting commitments	<ul style="list-style-type: none"> • Evidence that RSG casinos have partnered with local groups/organizations and created jobs in their respective areas. • RSG has opened 3 casino properties since 2008 and has done so in regions new to gaming (need to identify, hire and train applicants not familiar with gaming positions). • Rivers Casino Pittsburgh nearly doubled workforce since 2009, ~80% of workforce was new to industry at the time of opening. Rivers Casino works with ~62 community partners (had 31 partners at the time of opening) and received over 30,000 applications for 1,000 positions. • SugarHouse and Rivers Casino Des Plaines reached the underemployed/unemployed population through partnering with various local groups/organizations. SugarHouse received over 24,000 applications for ~ 1,000 positions, Des Plaines received over 66,000 applications for 1,200 positions.
Rating	Sufficient/Very Good

3.6 – Plan for Workforce Development – Provide your plan for workforce development as set forth in the Host Community Agreement (HCA) and any surrounding community agreements that the applicant has executed.	
Expectations of Applicant	<ul style="list-style-type: none"> • Number of jobs? • Number of positions where internal growth is possible? • Has proponent demonstrated workforce development in past experience? • Length of experience with workforce development/training programs? • Number of employees who have completed workforce development/training programs? • What has Applicant done in other jurisdictions (and does the Applicant proposed to do in Mass) to work with community-based organizations to identify the unemployed and underemployed for job opportunities? • Linkage/agreements in place with colleges/institutions? • Evidence of historical arrangements with colleges/institutions?
MG&E	
Overall Comments on Application	Within other jurisdictions RSG casinos have engaged the local community in hiring and training processes and there is evidence of workforce development (advancement) at these casinos. MG&E did not commit to specific employment figures for Brockton but stated they will implement and work off of what has been done in other jurisdictions.
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • HCA stipulates working in good faith and providing reasonable preference to qualified Brockton residents for both construction and permanent jobs (no quantifiable targets or commitments). • MG&E will host construction and operation job fairs (citing the Massasoit Community College Conference Center or the Shaw's Center as potential event sites) to inform local residents about job opportunities and assist them in becoming qualified for said jobs. • MG&E has earmarked \$11.9 million for a pre-opening budget. This figure includes pre-opening salary/wages, recruiting and training.
Existing and past practices supporting commitments	<ul style="list-style-type: none"> • Rivers Casino Des Plaines and Pittsburgh, and SugarHouse Casino Philadelphia have promoted ~1,400 since the casinos have opened, with 300 individuals being promoted in the past year. Collectively, the three casinos employ approximately 4,000 people.
Rating	Insufficient/Sufficient

<p>3.7 Affirmative Action Plan – Provide an explanation as to how the Applicant proposes to establish and implement an affirmative action program of equal opportunity whereby specific goals for the utilization of minorities, women and veterans on construction jobs; provided, however, that such goals shall be equal to or greater than the goals (15.3% for minorities, 6.9% for women) contained in the Executive Office for Administration and Finance Administration Bulletin Number 14, available at: http://www.mas.gov/anf/budget-taxes-and-procurement/admin-bulletins/state-contract-equal-opp.html.</p>	
Expectations of Applicant	<ul style="list-style-type: none"> • Targeted number of positions earmarked? <ul style="list-style-type: none"> • Sub-breakdown by need? • Targets for management versus hourly positions? • Quality of positions available? • Evidence of past experience with affirmative action programs? • Agreements in place with career centers?
MG&E	
Overall Comments on Application	RSG casinos have formal diversity plans in place in PA and IL and are proven equal opportunity employers. MG&E has proven intentions – by engaging a diversity consultant (Gilbane Building Company) – to create an equal opportunity workforce at the Brockton Casino.
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • MG&E will adhere to or exceed the minimum 15.3% ethnic minority and 6.9% women construction diversity stipulation in the Executive Office for Administration & Finance Administration Bulletin 14. • Have engaged a consultant (Gilbane Building Company) to develop a sample Diversity Plan (which outlines 50% local, 25% minorities, and 10% women for diversity) which MG&E will “potentially” adhere to. • Sample diversity plan (prepared by Gilbane). • Plan to collaborate with local groups to discover and provide job opportunities for diverse employee bases.
Existing and past practices supporting commitments	<ul style="list-style-type: none"> • Formal diversity plans exist with respect to affiliated casinos in PA and IL. • Affiliated casinos have experience identifying and informing diverse bases about jobs and providing the necessary training resources.
Rating	Sufficient

3.8 – Workforce Development –

A. Describe your workforce development plan for the construction phase and explain how the Applicant proposes to implement it such that it: (i) incorporates an affirmative action program of equal opportunity by which the Applicant guarantees to provide equal employment opportunities during the construction phase. (Applicant may reference response to question 3-7); (ii) utilizes the existing labor force in the commonwealth; (iii) estimates the number of construction jobs a gaming establishment will generate and provides for equal employment opportunities and which includes specific goals for the utilization of minorities, women and veterans on those construction jobs; (iv) outlines the responsibilities of the Applicant’s General Contractor/ Manager(s) to implement the plan.

B. Describe your workforce development plan for the operations phase and explain how the Applicant proposed to implement it such that it: (i) incorporates an affirmative action program of equal opportunity by which the Applicant guarantees to provide equal employment opportunities to all employees qualified for licensure in all employment categories, including persons with disabilities (Applicant may reference response to question 3-7); (ii) utilizes the existing labor force in the commonwealth; (iii) identifies workforce training programs offered by the gaming establishment; (iv) identifies the methods for accessing employment at the gaming establishment; and (v) addresses workplace safety issues for employees.

Expectations of Applicant	<p>Overall targets for workforce development:</p> <ul style="list-style-type: none"> • Total number of positions earmarked for minorities, women and veterans? • Number of jobs earmarked for local residents • Number of construction jobs earmarked for minorities, women and veterans? • Agreements in place with local colleges/institutions? • Ratio of jobs where progression is possible • Experience with workplace safety policies and practices in other jurisdictions? Is there evidence/Applicant demonstrated workplace safety record elsewhere?
MG&E	
Overall Comments on Application	The applicant, with its consultant, has outlined various potential steps it could take to build up and develop a diverse workplace. They have stated they will create a formal diversity plan, as other RSG casinos have done in other jurisdictions.
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • In addition to establishing its own workplace diversity plan, MG&E will look to its contractors and subcontractors to embrace diversity in its workforce through planned diversity goals – the diversity of contractor/subcontractor could play a role in the selection processes. • The engaged consultants (Gilbane) will work with vendors to help ensure diversity goals are adhered to. • Will consider requiring a three-year history outlining diversity on previous projects that had this requirement. • Consultants will require general contractors to compile daily & weekly documentation on workforce diversity. • Limited response provided for operational phase; no information on workplace safety, accessing employment. • Cite a track record of creating and executing a diversity plan that typically applies to the general contractors and construction of the base building.
Existing and past practices supporting commitments	<ul style="list-style-type: none"> • Midwest Gaming (partnership controlling Rivers Des Plaines) diversity and inclusion plan. • RSG casinos in PA and IL have formal diversity plans and have looked to engage various diverse population bases through partnership with local groups. • Rivers Casino Schenectady has partnered with local groups/organizations to engage diverse groups and create recruitment processes.
Rating	Sufficient

3.9 – HR Practices – State whether the applicant has prepared, and how the applicant proposes to establish, fund and maintain human resource hiring and training practices that promote the development of a skilled and diverse workforce and access to promotion opportunities through a workforce training program that:

- (i) establishes transparent career paths with measurable criteria within the gaming establishment that lead to increased responsibility and higher pay grades that are designed to allow employees to pursue career advancement and promotion;
- (ii) provides employee access to additional resources, such as tuition reimbursement or stipend policies, to enable employees to acquire the education or job training needed to advance career paths based on increased responsibility and pay grades; and
- (iii) establishes an on-site child day-care program.

Further, identify whether the applicant plans to establish employee assistance programs, including those relative to substance abuse and problem gaming, and outline its plan to establish a program to train its gaming employees in the identification of and intervention with customers exhibiting problem gaming behavior

Expectations of Applicant	<ul style="list-style-type: none"> • Job descriptions for each position? • Additional resources earmarked for job training and promotion? • Funds earmarked for on-site daycare program? • Is there a funding provision for employee assistance programs, including problem gambling/substance abuse counseling programs?
MG&E	
Overall Comments on Application	The applicants answer focused on what existing RSG casino facilities offer and that the Brockton Casino staff can expect the same offerings and training.
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • Existing employee training, job opportunities and employee assistance programs will be established at the Brockton Casino. • Applicant highlights that MG&E will give preference to internal promotions over external hires and that many promotions have occurred as a result of employment growth. • “Rush Street Gaming Leadership Excellence” training (business and leadership skills such as situational leadership, financial aptitude) provided to all supervisory employees. • The majority of the training MG&E plans on conducting for employees will be done internally with some being outsourced to external vendors. • RSG offers responsible gaming training as a preventative measure. • EAP programs are provided to all staff (professional counseling services for help in confronting personal problems such as alcohol and other substance abuse, marital and family difficulties, financial or legal troubles, and emotional distress) to target preventing and identifying signs of problems and how to remedy them. • On-site daycare not provided; in line with RSG corporate policy. Employees have option to allocate health care benefits towards child care services. • MG&E is targeting, whether union represented or not, to have all employees on the same benefits plan.
Existing and past practices supporting commitments	<ul style="list-style-type: none"> • RSG casinos have formal training programs, including, but not limited to: New Hire Orientation, “Inspired Service” training, Safety training, and compliance/regulatory training. • Employees have first access to RSG casino job postings. • RSG casinos offer employees assistance and counseling programs.
Rating	Sufficient

<p>3.10 – Organized Labor Contracts –State whether the Applicant has, is subject to, or is negotiating any contract with organized labor that covers the initial construction of the proposed gaming establishment. In preparing a response to this question, the Applicant should: (i) identify the number of employees and/or construction value expected to be covered by a Project Labor Agreement(s); (ii) provide signed Project Labor Agreement(s) applicable to the proposed gaming establishment; (iii) provide any studies or reports, including an estimate of economic benefits, that speak to construction labor; and (iv) identify whether the Applicant has included detailed plans for assuring labor harmony during all phases of the construction, reconstruction, renovation, development and eventual operation of the gaming establishment. The information provided in this answer should tie to any data provided on unionized workforce percentage contained in the MGC Data Template or elsewhere in the Application.</p> <p>3.11 – Organized Labor Contracts for Operations Phase – Outline the Applicant’s plans for use of unionized labor for the operation of the proposed gaming establishment, by providing: (i) the completed MGC Data Template, specifically the unionized labor tab; and (ii) information on planned Labor Harmony Agreements and neutrality agreements. Reference may be made to the response to question 3-10.</p>	
Expectations of Applicant	<ul style="list-style-type: none"> • History of employing unionized staff? • Experience negotiating with unions? • (i) Ratio of unionized to non-union employees? • (ii) The proportion of union jobs/payroll to total payroll? <ul style="list-style-type: none"> • Funds allocated for unionized versus non-unionized staff • (iii) Are there any completed reports showing economic benefit to the region? <ul style="list-style-type: none"> • Examples of previous projects providing economic impacts? • (iv) Past experience with unionized staff in construction and development of gaming establishments • Experience with project labor/neutrality agreements? • History of strike actions and outcomes? • Measures in place to deal with union disputes?
MG&E	
Overall Comments on Application	No estimated % of union breakdown was provided for the Brockton Casino. Limited union representation is present at other RSG casinos.
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • A Memorandum of Understanding (MOU) with the Brockton Area Building and Construction Trades Council (BABCTC) has been executed and a working draft is completed. A Labor Agreement will be signed if a license is awarded.
Existing and past practices supporting commitments	<ul style="list-style-type: none"> • Union representation is present at RSG casinos in the following capacities: in Philadelphia, the warehouse and facilities team are affiliated with the Metropolitan Regional Council of Carpenters, Southeastern Pennsylvania, State of Delaware and Eastern Shore of Maryland, United Brotherhood of Carpenters and Joiners of America. The Pittsburgh facilities team is represented by the International Union of Operations. • Multiple “Top Workplace/Best Places to Work” awards have been won by the various RSG casino facilities. • In Schenectady, pursuant to the New York gaming statute, an affiliate, Capital Region Gaming, LLC signed a labor harmony agreement with the New York Hotel and Motel Trades Council, AFL-CIO. Presently, MG&E does not have a signed labor agreement covering operations in Brockton but may enter into such discussion in the future. • UNITE HERE has received concerns (publically) about RSG labor practices (overly aggressive actions designed to dissuade certification).
Rating	Sufficient

3.12 – Employee Retention Record – Please describe and provide documentation that outlines applicant's employee retention record at other operational sites.																					
Expectations of Applicant	<ul style="list-style-type: none"> Projected ratio of employee retention (positioning of “retention” vs. “turnover”) Benchmarks of employee turnover at similar sites? Employee retention programs in place? 																				
MG&E																					
Overall Comments on Application	RSG casinos have steadily experienced reduced turnover levels at their properties and each property has won an award relating to workplace satisfaction. MG&E is projecting similar rates at the Brockton Casino. Retention rates however, are much lower than identified by other Category 1 licensees. No plan or approach documented to improve retention.																				
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> Retention rates are estimated at 72%-82% (turnover of 18%-28%) for years 1 through to 15. 																				
Existing and past practices supporting commitments	<ul style="list-style-type: none"> Turnover at RSG casinos is as follows: <table border="1" style="margin-left: 40px;"> <thead> <tr> <th>Property</th> <th>2011</th> <th>2012</th> <th>2013</th> <th>2014</th> </tr> </thead> <tbody> <tr> <td>Rivers Casino Pittsburgh</td> <td>[redacted]</td> <td>[redacted]</td> <td>[redacted]</td> <td>[redacted]</td> </tr> <tr> <td>SugarHouse Casino</td> <td>[redacted]</td> <td>[redacted]</td> <td>[redacted]</td> <td>[redacted]</td> </tr> <tr> <td>Rivers Casino Des Plaines</td> <td>[redacted]</td> <td>[redacted]</td> <td>[redacted]</td> <td>[redacted]</td> </tr> </tbody> </table> <p style="margin-left: 40px;">Multiple “Top Workplace/Best Places to Work” awards have been won by RSG casino facilities in Des Plaines, Philadelphia, and Pittsburgh.</p> <ul style="list-style-type: none"> The “Four Fundamentals” of RSG’s retention strategy/HR environment are: 1) Have fun at work 2) Provide memorable guest experience 3) Act with the utmost integrity 4) Respect – give it, get it. Retention rates since opening are as follows: Rivers, Pittsburgh=[redacted]; SugarHouse, Philadelphia=[redacted] Rivers, Des Plaines=[redacted] 	Property	2011	2012	2013	2014	Rivers Casino Pittsburgh	[redacted]	[redacted]	[redacted]	[redacted]	SugarHouse Casino	[redacted]	[redacted]	[redacted]	[redacted]	Rivers Casino Des Plaines	[redacted]	[redacted]	[redacted]	[redacted]
Property	2011	2012	2013	2014																	
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SugarHouse Casino	[redacted]	[redacted]	[redacted]	[redacted]																	
Rivers Casino Des Plaines	[redacted]	[redacted]	[redacted]	[redacted]																	
Rating	Insufficient/Sufficient																				

3.13 – Ethnic Diversity – Please describe and provide documentation that outlines the ethnic diversity of the applicant's workforce at other locations, the plans for workforce diversity the applicant has used at those facilities, the results of those plans and, unless they are self-explanatory, the metrics the applicant has used to determine those results.																																																																												
Expectations of Applicant	<ul style="list-style-type: none"> Ratio of minority employees to total? Levels of promotion of minority employees? Management versus hourly positions held by minorities? Salaries and wages of minority employees? Consistency of minority employment practices over time? Programs in place for workplace diversity? Evidence that employee diversity programs have been implemented? 																																																																											
MG&E																																																																												
Overall Comments on Application	RSG casino facilities have a proven track record in terms of employing diverse workforces/vendors and MG&E intends to replicate diversity efforts in Brockton.																																																																											
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> As an equal opportunity employer, a formal diversity plan will be established and MG&E intends to collaborate with local groups to identify and inform diverse populations on jobs, necessary skills, and training resources. 																																																																											
Existing and past practices supporting commitments	<p>Comparison of Female and Minority Representation (Rep.) in the Casino Relative to the City:</p> <table border="1"> <thead> <tr> <th rowspan="2">Property</th> <th colspan="2">Female Representation</th> <th colspan="5">Minority Representation</th> </tr> <tr> <th>Female Rep. in Casino</th> <th>Female Rep. in City</th> <th>Minority Rep. in Casino</th> <th colspan="5">Minority Representation in City</th> </tr> <tr> <th></th> <th>% Female</th> <th>Gender Ratio (M/F)</th> <th>% Minority</th> <th>% White</th> <th>% Black</th> <th>% Hispanic</th> <th>% Asian</th> <th>% Other</th> </tr> </thead> <tbody> <tr> <td>Rivers-Pittsburgh</td> <td>40</td> <td>48/52</td> <td>28</td> <td>66</td> <td>26</td> <td>2.3</td> <td>4.4</td> <td>1.3</td> </tr> <tr> <td>SugarHouse Philadelphia</td> <td>40</td> <td>48/52</td> <td>53</td> <td>36.9</td> <td>42.2</td> <td>13.3</td> <td>6.3</td> <td>1.3</td> </tr> <tr> <td>Rivers-Des Plaines</td> <td>43</td> <td>49/51</td> <td>56</td> <td>68</td> <td>1.8</td> <td>17.2</td> <td>11.4</td> <td>1.6</td> </tr> <tr> <td>Brockton</td> <td>n.a.</td> <td>48/52</td> <td>n.a.</td> <td>42.9</td> <td>31.2</td> <td>10</td> <td>2.3</td> <td>13.6</td> </tr> <tr> <td><i>VP Level and Up</i></td> <td>45</td> <td>n.a.</td> <td>35</td> <td>n.a.</td> <td>n.a.</td> <td>n.a.</td> <td>n.a.</td> <td>n.a.</td> </tr> </tbody> </table> <p>Source: 2010 US Census</p> <p>Female and minority vendor spending in 2013 was as follows: [redacted]</p> <ul style="list-style-type: none"> RSG casinos have also made reasonable efforts to hire individuals with disabilities. 						Property	Female Representation		Minority Representation					Female Rep. in Casino	Female Rep. in City	Minority Rep. in Casino	Minority Representation in City						% Female	Gender Ratio (M/F)	% Minority	% White	% Black	% Hispanic	% Asian	% Other	Rivers-Pittsburgh	40	48/52	28	66	26	2.3	4.4	1.3	SugarHouse Philadelphia	40	48/52	53	36.9	42.2	13.3	6.3	1.3	Rivers-Des Plaines	43	49/51	56	68	1.8	17.2	11.4	1.6	Brockton	n.a.	48/52	n.a.	42.9	31.2	10	2.3	13.6	<i>VP Level and Up</i>	45	n.a.	35	n.a.	n.a.	n.a.	n.a.	n.a.
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Rating	Sufficient																																																																											

Criterion 2: Supporting External Business and Job Growth	
Criterion 2 Rating	Sufficient
	Overall a sufficient rating for Supporting External Business and Job Growth. MG&E has displayed intentions to integrate and engage the surrounding businesses and create job growth. The Application lacked specific, detailed plans for the Brockton market and largely described the track record at other properties as proof of intent.

Criterion 2: Grouping of Questions by Similarity	
Group 1 Rating	Sufficient
Group 1 - Local Business Promotion and Support (Questions 14, 15, 16, 17, 18 and 19)	<ul style="list-style-type: none"> Lacked local specifics and detailed plans to promote businesses, however, stated intentions to partner with local organizations and committed capital (\$50k/annum) to purchase local business gift cards for rewards program. Cooperation agreement signed with Brockton 21st Century (owner of The Shaw's Center and Campanelli Stadium). Delegated local supplier integration into the construction phase to general contractors and construction management firms. Outlined plans to replicate strategies at affiliated properties to engage local vendors through vendor fairs and maintain local vendor database. Showed greater consideration by listing suggested locations and earmarked hiring funds. Identified opportunities for local businesses to be integrated into the casino and the casinos' ability to bring traffic to the region. Affiliated properties have proven track record of purchasing goods and services from local businesses with MG&E outlining modest committed funds for local enterprises.
Group 2 Rating	Insufficient
Group 2 - Support of Minority-, Women-, and Veteran-Owned Businesses (Question 20)	<ul style="list-style-type: none"> Failed to identify specific goals to engage minority, women, and veteran-owned businesses. Affiliated properties have track record of modest MWVBE spending.
Group 3 Rating	Sufficient/Very Good
Group 3 - Regional Impact (Questions 21 and 23)	<ul style="list-style-type: none"> Modest projections for spin off spending with plans to link local businesses with rewards program. MG&E plans are aligned with the City of Brockton's economic development plans and financial commitments from MG&E should bolster municipal efforts.
Group 4 Rating	Sufficient
Group 4 - Domestic Gaming Equipment (Question 22)	<ul style="list-style-type: none"> Applicant demonstrated sufficient evidence of fulfilling domestic gaming equipment suppliers.

<p>3.14 – Local Business Promotion – Describe plans for promoting local businesses in host and surrounding communities including developing cross-marketing strategies with local restaurants, small businesses, hotels, retail outlets and impacted live entertainment venues. Provide examples of where you have employed a similar strategy in the past and the results of this strategy. (Applicant may refer to response to question 3-18).</p> <p>3.18 – Promoting Regional Businesses – Provide plans to demonstrate how you will support and/or promote regional businesses. (Applicant may refer back to response to question 3-14).</p>	
Expectations of Applicant	<ul style="list-style-type: none"> • Number of local/regional businesses with partnership arrangements? • Dollar amount of goods/services? • Variety of local/regional business sectors partnered? • Arrangements already in place with local/regional businesses? • Extent of relationships with local/regional businesses in other jurisdictions? • Impact of cross-marketing initiatives in other jurisdictions?
MG&E	
Overall Comments on Application	MG&E referenced the numerous RSG casino partnerships with local businesses in other jurisdictions and highlighted the ability to link businesses to the Rush Rewards Loyalty Program. MG&E didn't lay out overly specific plans for its Brockton operation but plans to replicate the partnership efforts made in other jurisdictions.
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • Local/regional businesses will be included in the Rush Rewards Loyalty Program, linking them to the programs' existing client base and encouraging business with these partners. • Partnership allows for affiliated businesses to be featured on the casinos' website, direct mail, and email send outs. • MG&E will promote nearby hotels (in addition to MG&E's own hotel) and offer tie-in packages such as "stay & play" offers whereby patrons can get free casino play for booking a room with an affiliated Brockton hotel. To help connect the casino location and affiliated Brockton hotels, MG&E will offer free transportation services. • The abovementioned free transportation services will additionally apply to other local businesses and attractions to encourage external activity by casino patrons. • MG&E will make annual purchases of \$50k in local business gift cards and provide these to casino loyalty card members. • MG&E has formed a Cooperation Agreement (dated Nov. 9/15) with Brockton 21st Century, which owns Campanelli Stadium and The Shaw's Center, to discuss joint marketing opportunities/efforts on a quarterly basis.
Existing and past practices supporting commitments	<p>SugarHouse partners with ~27 hotels, 91 restaurants, 3 golf courses and nightlife venues and has budgeted [redacted] in sponsorships (3-31).</p> <ul style="list-style-type: none"> • Rivers Casino Des Plaines/Pittsburgh and SugarHouse partner with local transport services to encourage tourism and traffic to additional businesses. • Existing RSG casinos also collaborate and partner with local groups of commerce and tourism to co-promote the respective regions as a destination and sponsor events and attractions. • Rivers Casino Pittsburgh won the 2012 Pittsburgh Tourism Partner Award for its collaborative efforts.
Rating	Sufficient

3.15 – Local Suppliers (Construction Phase) – Describe plans for use of Massachusetts based firms, suppliers and materials in the construction and furniture, fixtures, and equipment (“FFE”) furnishing phase of the applicant's project.	
Expectations of Applicant	<ul style="list-style-type: none"> • Number of local suppliers with partnership arrangements? • Dollar amount of goods/services? • Variety of local business sectors partnered? • Ratio of local suppliers to total in the construction, FFE phase? • Arrangements already in place with local suppliers? • Extent of relationships with local suppliers in other jurisdictions?
MG&E	
Overall Comments on Application	MG&E will require interested construction partners to integrate local suppliers into the building process.
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • MG&E will require interested general contractors and construction management firms to provide detailed plans to integrate local suppliers along with records of historical efforts to include local suppliers on projects. • MG&E will oversee this process to make sure local vendors are considered before contracts are opened up to national suppliers. • Refer to Appendix D1 for construction cost overview.
Existing and past practices supporting commitments	<ul style="list-style-type: none"> • No details provided.
Rating	Insufficient

3.16 – Local Suppliers (Operations Phase) – Describe experience in contracting with local business owners for provision of goods and services to the gaming establishment.	
Expectations of Applicant	<ul style="list-style-type: none"> • Number of local business owners with contracted arrangements? • Cost analysis of partnering with local business owners? • Variety of local business owners partnered? • Arrangements already in place with local business owners? • Extent/length of relationships with local business owners in other jurisdictions? • Quantification of success record in other jurisdictions (including explanation of why buy local programs may have or not have worked)
MG&E	
Overall Comments on Application	The applicant plans to replicate RSGs’ strategy of hosting local vendor fairs and creating a database of local suppliers which can be referenced to when looking for goods/services vendors.
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • MG&E will host vendor fairs prior to opening and during operations to advertise and inform local vendors on job opportunities and how to become qualified for said jobs (eg. Providing information on MGC licenses, and lists of goods/services needed). Additionally, these fairs will serve as means to educate local vendors on volumes/quantities needed to support operations. MG&E has cited the Massasoit Community College Conference Center and the Shaw’s Center as potential vendor fair sites. Additionally, MG&E has earmarked \$11.9 million for a pre-opening budget, of which recruiting and training activities are part of. • MG&E will create a vendor database so that in the future they can reach out to businesses to request goods/services. • MG&E states they will “strategically source goods and services and create a fair bid process” to assist and favor local businesses in providing goods/services for the casinos operations. MG&E provided little further detail on local vendor hiring intentions.
Existing and past practices supporting commitments	<ul style="list-style-type: none"> • RSG related properties have previously held on-going operation vendor fairs to engage the local business community in the casinos’ job opportunities. MG&E cites vendor fairs.
Rating	Sufficient

3.17 – Assisting Businesses – Provide your plans to assist businesses owners in the Commonwealth in identifying the future needs of the applicant for the provision of goods and services to the establishment.	
Expectations of Applicant	<ul style="list-style-type: none"> • Arrangements in place with local business owners? • Dollar amount of these arrangements? • Types of roles local business will play? • Length and type of arrangement with local business?
MG&E	
Overall Comments on Application	The applicant will create awareness of what the casino needs through vendor fairs, which will help businesses determine how they can be a part of the process. This is something RSG casinos have done in the past.
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • MG&E states that the casino will bring traffic to Brockton and that the casino will actively divert traffic externally during peak capacity periods. • The applicant plans to promote businesses through events and other marketing initiatives and include local businesses in its operations. • MG&E plans to partner with the Metro South Chamber of Commerce to collaborate on engaging local businesses/organizations in the process of creating mutually beneficial relationships.
Existing and past practices supporting commitments	<ul style="list-style-type: none"> • RSG affiliated casinos have partnered with local communities/organizations and businesses to create a mutually beneficial relationship in the past. RSG cites their operations in Pittsburgh, Philadelphia, and Des Plaines as an example of their efforts.
Rating	Sufficient

3.19 – Vendor Supplied Goods – Complete the MGC Data Template detailing proposed breakdowns by category of expenditures for vendor supplied goods and services.	
Expectations of Applicant	<ul style="list-style-type: none"> • Past experience with budgeting for vendor supplied goods? • Benchmarks provided? • Benchmarks in line with industry averages? • Extent of experience with vendor supplied goods?
MG&E	
Overall Comments on Application	RSG casinos have a proven financial record of utilizing local vendors and have outlined expenditure plans for the Brockton Casino.
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • No dollar commitments with respect to local spending/purchase of supplies are contained in the HCA. MG&E plans to purchase about \$15 million in operating supplies with an additional \$60 million in operating expenses. Total value added (direct, indirect and induced) of operating expenditures is estimated at \$292 million within Massachusetts (Innovation Group). • Of this, local spending will account for \$15.44 million in year 1. Local spending includes: food and beverage - \$5.79m; advertising/sponsorship - \$3.23m; supplies - \$1.34m; marketing promotions - \$1.32m; professional fees - \$1.09m; and contract maintenance and repairs/maintenance making up an additional \$.73m and \$.5m, respectively. Local spend will also go to human resources, gaming expenses, and spending on special events/entertainment. • Broader economic impacts (e.g. spending by visitors traveling to and from the casino as well as the indirect and induced impacts from initial spending) were estimated by the Innovation Group.
Existing and past practices supporting commitments	<ul style="list-style-type: none"> • RSG casino properties have the following expenditure records in host communities: [redacted]
Rating	Sufficient

<p>3.20 – Minority, Women and Veteran Businesses – Complete the MGC Data Template detailing proposed breakdowns by category of expenditures for vendor supplied goods and services. Identify the specific goals, expressed as an overall program goal applicable to the total dollar amount of contracts, for utilization of: (i) minority business enterprises; (ii) women business enterprises; (iii) veteran business enterprises to participate as: (a) Contractors in the design of the gaming establishment; (b) Contractors in the construction of the gaming establishment; and (c) Vendors in the provision of goods and services procured by the gaming establishment and any businesses operated as part of the gaming establishment. Discuss your experience, programs or strategies in other jurisdictions as evidence of your ability to meet these goals. (See related attestation in section B. Signature Forms).</p>	
Expectations of Applicant	<ul style="list-style-type: none"> • Amount of funding provided to employ minorities, women and veterans for design elements. • Amount of funding provided to employ minorities, women and veterans for construction elements. • Amount of funding provided to employ minorities, women and veterans for provision of goods and services.
MG&E	
Overall Comments on Application	MG&E did not quantify goals for MBE, WBE, and/or VBE spending. RSG stated strong financial track record of supporting MWVBE businesses in other locations and have committed to engaging the appropriate MWBE and veteran businesses in the bidding process. No detail provided.
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • MG&E will engage MWVBE businesses and, if need be, assist them in getting Business Enterprise certified. MG&E will aim to have at least one MWVBE or veteran business as part of the bidding process for the respective goods/services needed.
Existing and past practices supporting commitments	RSG casino properties have the following expenditure records for MWVBE: [redacted]
Rating	Insufficient

3.21 – Projected Benefit for Regional Businesses – Provide projections for spending by same-day and overnight visitors to the proposed gaming establishment at regional businesses for the first five years of operations on a best, average and worst case basis (as linked to the revenue projections provided in Category 2-Finance). The methodology used to produce the projections and the assumptions should also be provided.	
Expectations of Applicant	<ul style="list-style-type: none"> • Are projections in line with Applicants efforts in other jurisdictions? • Are projections based on previous experience? Examples? • Are projections realistic and achievable? • Evidence of incremental visitation to the host community (e.g., hotel room nights, visitation, attraction attendance or similar measures)? • Are benchmarks used to create projections in line with industry norms?
MG&E	
Overall Comments on Application	The applicant expects businesses in the surrounding area to benefit from an increase in traffic to the area as a direct result of the casino. The presence of a casino is expected to benefit hotels, F&B and retail establishments. The application states that experience with other RSG casinos has shown that other businesses benefit from the presence of a casino in the area.
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • The applicant expects visitor expenditure at local businesses to range from \$15m - \$21m annually for the first 5 years. • Projected casino patron off-site capture rates are expected to be 1.25% for hotels, 2% for F&B, and 5% for retail/other (Source: Innovation Group – Economic Impact Analysis, Brockton). • Businesses in the area linked to Rush Rewards are expected to experience greater traffic as customers will have greater incentive to take advantage of deals, however, indirect benefits are expected simply from an increase in visitors to the region.
Existing and past practices supporting commitments	<ul style="list-style-type: none"> • The added benefit of a casino to surrounding businesses has been demonstrated in other jurisdictions where RSG operates casinos.
Rating	Sufficient

3.22 – Domestic Slot Machines – Describe any plans the Applicant has for purchasing domestically manufactured slot machines for installation in the gaming establishment and provide the names of all proposed vendors of gaming equipment to the best of your present knowledge and belief. If more space is needed, please use an attachment. Provide the primary business address for each vendor in an attachment.	
Expectations of Applicant	<ul style="list-style-type: none"> • Ratio of domestic to imported? • Dollar spend on domestic slot machines versus total slot spend? • Repair/service contracts with domestic providers?
MG&E	
Overall Comments on Application	The applicant plans to replicate the ~99% domestically manufactured slot machines currently used at the other RSG facilities at the Brockton Casino.
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • MG&E is planning on primarily purchasing domestic slot machines in line with other RSG facilities. The total number will depend on the Massachusetts Gaming Commission' approval of the selected domestic machine providers/products.
Existing and past practices supporting commitments	<ul style="list-style-type: none"> • ~99% of the slot machines used at other RSG casinos are manufactured domestically. • 7/8 slot machine suppliers RSG utilizes manufacture their machines in the US.
Rating	Sufficient

3.23 – Regional Economic Plan Coordination – State whether the applicant's proposed gaming establishment is part of a regional or local economic plan, and provide documentation demonstrating inclusion and coordination with regional economic plans.	
Expectations of Applicant	<ul style="list-style-type: none"> • Incremental visitation? • Incremental employment? • Use of local/regional business in all phases of casino complex? • \$ amount of economic impact projected? • Evidence of past experience working with local economic development agencies? • How has the development, operation and marketing of the gaming facility been tied to the applicable regional economic plan?
MG&E	
Overall Comments on Application	As stipulated in the HCA, MG&E has made various financial commitments to the City and will look to encourage local economic activity through partnerships with local businesses, the creation of jobs within the area and increased visitor traffic.
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • The casino aligns with the City's and Old Colony Planning Council's local and regional goals to spur economic activity and create job opportunities. The proposed casino will create both direct and indirect jobs, favoring local residents in hiring practices, and generate over \$10m in annual payments to the City to be used to spur tourism among other purposes. • The casino intends to work jointly with the City in the form of planning an entertainment district (committing \$100K to research - source: Commissioners Packet from Host Community Hearing (March 1/16)), of which the casino would be a piece (the Brockton 2025 plan mentions an entertainment district, of which a casino would be a part). • Additional community enhancements will also be contributed in the form of a \$3m community enhancement fee included in the HCA.
Existing and past practices supporting commitments	<ul style="list-style-type: none"> • RSG has established themselves in their respective communities and created jobs for the local population. They have partnered with local businesses to jointly promote and attract people to the various areas they are present and they have played an active role in the communities through their affiliation with various commerce, tourism and diversity groups/organizations.
Rating	Very Good

Criterion 3: Regional Tourism and Attractions	
Criterion 3 Rating	Sufficient
	Overall sufficient rating for Regional Tourism and Attractions although the applicant clearly positions the Brockton project as a “local resident” casino. Displayed relative strength in identifying potential local/regional business partnership opportunities and intentions to collaborate and engage the appropriate tourism/economic agencies, however, lacked robust formal displays of communication/agreements with potential partners. MG&E has committed impactful levels of funding and identified alignment with the city/regions goals of development and overall advancement.

Criterion 3: Grouping of Questions by Similarity	
Group 1 Rating	Sufficient
Group 1 - Tourism and Regional Promotion and Marketing (Questions 24, 25, 26, 27, 29 and 31)	<ul style="list-style-type: none"> • Demonstrated intentions to partner with local venues and tourism/economic organizations (ie. Cooperation agreement with Brockton 21st Century). However, lacked specifics and initiative for formal partnerships and reliance on Boston and area tourism marketing entities and products; little knowledge demonstrated of Brockton/Plymouth County. • Highlighted affiliated properties previous marketing strategies with intentions to replicate efforts but lacked local specifics and uniqueness.
Group 2 Rating	Sufficient
Group 2 - Other amenities, enhancements and strategies (Questions 28, 30 and 32)	<ul style="list-style-type: none"> • Modest planning for non-gaming amenities however lack of mention for how the casino will use non-gaming amenities to attract and market to patrons. • Demonstrated commitment to aiding the local economy through community enhancement fee (\$3 million/annum – 5% of which goes to Brockton Community Foundation) and committed capital towards economic development and planning in Brockton. • Expressed intents to host entertainment athletic events, however lacked sensitivity and due diligence towards the local market (ie. Lack of emphasis on Brockton’s rich boxing history).

3.24 – Local Agreements – Provide local agreements designed to expand gaming establishment draw (i.e. - number of patrons brought to the region).	
Expectations of Applicant	<ul style="list-style-type: none"> • Past experience using local agreements? • Amount of incremental visitation? • Amount of incremental spend?
MG&E	
Overall Comments on Application	The applicant signed a Cooperation Agreement (dated Nov. 9/15) with Brockton 21 st Century, which owns Campanelli Stadium and The Shaw's Center, to discuss joint marketing opportunities/efforts on a quarterly basis. Other formal efforts have been limited, although indicating intentions to create partnerships to similar other RSG casinos where a history of partnering with local businesses has been developed.
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • In addition to partnering with Brockton 21st Century, MG&E plans to partner with various local businesses, attractions, events and festivals. The applicant listed the following as potential partners: Fuller Craft Museum, Xfinity Center, Levitate Music and Arts Festival, Plymouth Bay Winery, Pioppi's, Plymouthcruises.com, American Theatre Company, Zeiterion Theatre, and the Boston area sports teams. • MG&E will work alongside the local Chamber of Commerce and tourism sector to explore Brockton specific events to attract visitors.
Existing and past practices supporting commitments	<ul style="list-style-type: none"> • RSG casinos have a proven track record of partnering with local/regional businesses and creating events with partners to attract visitors to the area. An example is the Rivers Casino jointly-held event with the Carnegie Mellon University in Pittsburgh.
Rating	Sufficient

3.25 – Cross Marketing – Provide plans that demonstrate how you will cross-market with other attractions.	
Expectations of Applicant	<ul style="list-style-type: none"> • Target markets aligned with State/regional goals? • Arrangements in place? • Dollars allocated to marketing versus other departmental expenditure? • Ration of dollar amount spend in marketing to projected gaming win? • Past experience in local attraction cross-marketing initiatives? • Marketing tactics detailed? Historical success with marketing tactics? • Are there agreements in place with local tourism agencies?
MG&E	
Overall Comments on Application	RSG has utilized various cross-marketing efforts with its various existing casino facilities and their respective surrounding businesses/venues/attractions and teams. MG&E, with the identified potential partners, will look to replicate these efforts.
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • Cross-marketing initiatives will feature local Rush Rewards partners on the casinos website, direct mail, and emails. Promotions would also be featured at the hotel and around the property. • MG&E intends to sponsor a major county event, for example the Levitate Music and Arts Festival, to help increase brand awareness and encourage visitation. • Tour packages will assist in co-promoting the casino and aligned attractions/venues/businesses.
Existing and past practices supporting commitments	<ul style="list-style-type: none"> • As noted in the above sections, RSG casinos have successfully partnered with and co-promoted local businesses in Des Plaines, Philadelphia, Pittsburgh, and is establishing relationships in Schenectady. • As an example, SugarHouse has partnered and co-promoted ~27 hotels, 91 restaurants, 3 golf courses and nightlife venues and has budgeted ~\$1.1m in sponsorships.
Rating	Insufficient/Sufficient

3.26 – Collaboration with Tourism and Other Industries – Provide plans that detail collaboration by the Applicant with tourism and other related tourism promotion organizations, such as the Massachusetts Office of Travel and Tourism (MOTT).	
Expectations of Applicant	<ul style="list-style-type: none"> • Past experience collaborating with local tourism bodies in other jurisdictions? • Arrangements in place with local tourism/attractions bodies? • Impact on gaming win/ancillary spend of collaboration initiatives? • Dollars allocated to tourism collaboration initiatives versus other departmental expenditure? • Has Applicant demonstrated awareness/knowledge of local tourism industry where gaming facility is proposed to be located? Is this knowledge linked to marketing activities? • Are the proposed marketing activities substantive, quantifiable and measureable?
MG&E	
Overall Comments on Application	The applicant has outlined plans to partner with various groups/organizations to mutually benefit the Brockton area and the casino and will leverage the successful partnerships formed by other RSG casinos. Focus is on Boston-area residents.
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • With the goal of attracting more visitors and extending their stay and spend, MG&E will partner with Massachusetts Office of Travel and Tourism, Massachusetts Port Authority, Greater Boston Visitors and Convention Bureau, and the Metro South Chamber of Commerce. • MG&E is working with the City to plan an entertainment district (part of the Brockton 2025 plan, of which a casino location is mentioned as a part) that would be similar to MB Financial Park at Rosemont and Kansas City Power & Light District. MG&E has committed to providing \$100K in research for such a project (source: Commissioners Packet from Host Community Hearing (March 1/16)).
Existing and past practices supporting commitments	<ul style="list-style-type: none"> • Offering chartered transport from regional airports and key tourist destinations has been a key piece of the strategy in the past.
Rating	Sufficient

3.27 – International Marketing Efforts – Provide plans for international marketing efforts. Reference may be made to the response to question 3-26.	
Expectations of Applicant	<ul style="list-style-type: none"> • Target markets aligned with State/regional goals? • Are target markets identified? • International marketing tactics detailed? Historical success with international marketing tactics? • Arrangements in place with local tourism and local attractions (hotels, restaurants, attractions) • Dollars allocated to international marketing versus other departmental expenditure? • Ration of dollar amount spend in international marketing initiatives to projected gaming win? • Past experience in international marketing initiatives with other gaming facilities?
MG&E	
Overall Comments on Application	MG&E sees little opportunity for international visitation other than that already visiting the Boston area.
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • Collaborate with MOTT to increase awareness of the destination. • Partnerships and alignment with major organizations/venues/events (e.g. Boston sports teams) will help generate awareness and capture a portion of international traffic. • No mention of potential international visitation to Cape Cod and potential to capture en route.
Existing and past practices supporting commitments	<ul style="list-style-type: none"> • No specifics provided in terms of targeting international markets however, RSG casinos have partnered with well-established groups/organizations that have the potential to capture international awareness.
Rating	Insufficient/Sufficient

3.28– Other Amenities – Provide plans for any other on-site attractions and amenities beyond hotel, gaming, restaurants and in-house entertainment to draw customers. (Note: hotel optional for Category 2 applicants).	
Expectations of Applicant	<ul style="list-style-type: none"> • Extent of ancillary development planned? Dollar amount? • Incremental employment generated from other amenities? • Incremental visitation to the host community (e.g., hotel room nights, visitation, attraction attendance or similar measures) as a result of other amenities? • Impact on gaming win from other amenities? • Joint ventures with local businesses? • Extent to which other amenities complement gaming facility? • Previous projects completed with other amenities?
MG&E	
Overall Comments on Application	Complimentary amenities will surround the property and add addition appeal for casino patrons, mostly drawn from the Boston area.
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • Full amenity plans include 6 dining options, bar/lounges, 1,000 sq. ft. of retail, and a multi-purpose space that could seat up to 1,000 people. A spa, fitness area and pool will be developed for use by the hotel guests. • The partnership with Campanelli Stadium would allow access to events of up to 6,000 persons.
Existing and past practices supporting commitments	<ul style="list-style-type: none"> • RSG operates casinos that have similar amenity characteristics. • Hotel in Brockton proposal is a real amenity for RSG.
Rating	Sufficient

3.29 – Unique Business and Marketing Strategies – Provide additional plans that demonstrate unique business and marketing strategies to draw new revenues from new customers.	
Expectations of Applicant	<ul style="list-style-type: none"> • Customer database/player card system? • Are loyalty programs (e.g., player card systems that obtain/retain player databases) proactively used in marketing? Are they used in conjunction with local tourism businesses/agencies? • Win generated from player card versus total win? • Impact of ancillary facilities on gaming win? • Impact of marketing spend on gaming win? • Incremental visitation? • Joint ventures with local businesses/tourism bodies? • Pre-opening and grand opening activities arranged? • Use of complimentary (e.g., food, beverage, entertainment and related giveaways) in marketing the gaming facility with local businesses or independently?
MG&E	
Overall Comments on Application	Existing RSG properties have successfully utilized a variety of marketing strategies, which would be replicated in Brockton.
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • Similar marketing strategies previously used by Rush Street’s casinos will be utilized by MG&E for the Brockton Casino. These marketing strategies include: tailored marketing strategies on spot TV, cable TV, radio, print, out of home (OOH), digital, and marketing through events. • Loyalty program member marketing strategies such as emails and direct mail. • Social media campaign used during pre-opening/opening phases to build awareness.
Existing and past practices supporting commitments	<ul style="list-style-type: none"> • Rivers Casino Des Plaines social media pre-opening/opening phases led to 26,000 Rush Rewards member enrollments (prior to opening) and over 10,000 Facebook friends.
Rating	Sufficient

3.30 – Other Community Enhancements – Provide plans outlining community enhancements not already covered by section 3. <i>Economic Development</i> .	
Expectations of Applicant	<ul style="list-style-type: none"> Demonstrated linkage with Host Community.
MG&E	
Overall Comments on Application	MG&E is committed to enhancing the local/regional community with plans for financial support and also through the vested interest of creating a greater tourist destination and enhancing the tourist product offering.
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> MG&E will seek to enhance the surrounding community through exploring/planning an entertainment district (part of the Brockton 2025 plan, of which a casino is mentioned as a part), and providing \$100K for research (source: Commissioners Packet from Host Community Hearing (March 1/16)). Providing a Community Enhancement Fee of \$3m, 5% of the Annual Payment to the Brockton Community Foundation, and \$25k will be given to The Shaw's Center for business planning purposes.
Existing and past practices supporting commitments	<ul style="list-style-type: none"> RSG notes a history and proven track record of partnering with the surrounding community in jurisdictions such as Pittsburgh, Philadelphia, and Des Plaines.
Rating	Sufficient/Very Good

3.31– Record of Success – Provide documentation that outlines the applicant's record of success at other operational sites in other jurisdictions in meeting objectives similar to those discussed in the responses to questions 3-24, 3-25, 3-26, 3-27, and 3-29.	
Expectations of Applicant	<ul style="list-style-type: none"> Demonstrated record of cross-marketing, international marketing, economic development, and tourism collaboration at other facilities.
MG&E	
Overall Comments on Application	The applicant has demonstrated significant records of past success through casino facilities in Des Plaines, Philadelphia, Pittsburgh, and efforts underway in Schenectady. These facilities have engaged local communities, partnered with local businesses, and created economic activity.
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> Questions focused on past success.
Existing and past practices supporting commitments	<ul style="list-style-type: none"> Des Plaines (Rivers) – Rivers Des Plaines Casino demonstrated a track record by identifying participation with Illinois Chamber of Commerce, Des Plaines Chamber of Commerce, Chicagoland Chamber of Commerce, and the Illinois Restaurant Association. Rivers demonstrated relationships with Oakton Community College and workforce development, underemployment/unemployment engagement and hiring, and executing a diversity plan. Pittsburgh (Rivers) – Rivers Casino Pittsburgh has demonstrated local business support and partnership as identified through 40 hotel partners, offering “stay and play” promotions. Partnerships with cultural institutions were demonstrated through special package offers and “play, earn, and win” promotions – local gift card purchases are also part of local business support. Partnerships with local/regional economic and tourism organizations were identified. Philadelphia (SugarHouse) – In terms of partnership and local business/community support, SugarHouse partners with approximately 27 hotels, 91 restaurants, three golf courses, and various night clubs, linking many of these businesses into the Rush Rewards Plus Program. SugarHouse has demonstrated support to female and minority vendors through purchases and has shown to execute a diversity plan. Additional collaboration with local commerce and tourism entities were demonstrated.
Rating	Sufficient/Very Good

3.32 – Entertainment and Athletic Events – Provide details of the Applicant's plans for using entertainers and entertainment, including athletic events, to attract patrons to the gaming establishment.	
Expectations of Applicant	<ul style="list-style-type: none"> • Amount gaming win generated by entertainment? • Incremental visitation? • Amount of ancillary win generated by entertainment? • Past experience using entertainment to drive gaming revenues?
MG&E	
Overall Comments on Application	Identified in-house and external events and entertainment promotions as a basis for building additional demand. Incremental visitation as a result of these activities was not addressed.
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • In-house entertainment could feature live entertainment such as local musical acts, boxing matches, and other events accommodating MG&E Brockton's in-house venue. • External entertainment could be leveraged through partnerships with Campanelli Stadium/The Shaw's Center to offer festivals, trade/special interest shows, and outdoor events such concerts.
Existing and past practices supporting commitments	<ul style="list-style-type: none"> • Rivers Casino partnered with Carnegie Mellon University to host an innovative evening event.
Rating	Insufficient/Sufficient