



# *Responsible Gaming Considerations for Gambling Advertising*

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**MASSACHUSETTS GAMING COMMISSION**

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## An overview of gambling advertising practices and considerations based on principles of the Massachusetts Responsible Gaming Framework

*This document is intended to provide information to commissioners that will help inform decisions on policies and regulations related to gambling advertising in Massachusetts.*

### Introduction

Advertising to sell a product or service is nothing new, but how it's delivered to customers is rapidly changing. It's no longer television commercials, billboards, and newspaper ads. As technology evolves and becomes even more central in our daily lives, businesses, including the gaming industry, leverage this to engage with potential customers. Today, it's common practice to utilize user-specific data to curate highly targeted ads pushed out through social and digital media. The gaming industry uses additional strategies to reach and retain customers. For example, free-to-play advertising and offers for casino amenities are powerful marketing tools used to entice new and existing customers to gamble. The widespread expansion of sports wagering in the U.S. has brought this issue into focus, as the gaming industry seeks to secure new customers and retain existing ones. On the surface, it appears this is the free market at play, but gambling is not a risk-free activity. Commissioners may wish to consider additional measures to limit gambling advertising by gaming licensees and their parent companies in Massachusetts in order to minimize harm, particularly to youth and populations at greater risk of gambling-related harms.

Note: For the purpose of this paper the term gambling and gaming may be used interchangeably.

This white paper is organized into the following sections;

- 1) Current Massachusetts statute, regulations, and frameworks related to advertising and marketing;
- 2) An overview of some relevant research findings;
- 3) A review of select regulations in the U.S.;
- 4) Considerations for additional strategies and measures regarding gambling advertising.

### 1. Current Massachusetts statute, regulations, and frameworks related to advertising and marketing

In drafting the expanded gaming laws contained in Chapter 194 of the Acts of 2011, and G.L. c. 23K ("the Gaming Act"), the Massachusetts Legislature and Governor Patrick laid out a vision for casino gaming that would create the greatest possible economic benefit to the

Commonwealth balanced with the need to establish a comprehensive plan to mitigate gambling-related harm.

To fulfill the mandate of the expanded gaming law, the Massachusetts Gaming Commission (MGC) included as part of its mission a commitment to “*reduce to the maximum extent possible the potentially negative or unintended consequences of expanded gaming.*” To effectuate the mission, the MGC adopted a number of regulations and other measures with the goal of mitigating gambling harm to the maximum extent possible. As it relates to marketing, 205 CMR 150.3 states “*No gaming licensee shall authorize or conduct marketing, advertising, and/or promotional communications or activity relative to gaming that specifically targets persons younger than 21 years old*” and 205 CMR 133.06(3) prohibits gaming licensees from marketing to individuals on the Voluntary Self-exclusion list.

Pursuant to G.L. c. 23K, § 9(a)(8) requires the licensee to: “prominently display[] information on the signs of problem gambling and how to access assistance” and to describe “a process for individuals to exclude their names and contact information from a gaming licensee's database or any other list held by the gaming licensee for use in marketing or promotional communications . . . .” Further, section 21(a)(17) requires licensees to “keep conspicuously posted in the gaming area a notice containing the name and telephone number for problem gambling assistance.”

In addition, in 2014 (and revised in 2018) the MGC adopted a [Responsible Gaming Framework](#) (RGF) intended to inform gambling regulation and provide an overall orientation to responsible gaming practice and policy adopted by the MGC and gaming licensees. The RGF is based on the commitment by the MGC and its gaming licensees to the guiding value of ethical and responsible behavior. Within this commitment is an expectation that legalized gambling in the Commonwealth will be conducted in a manner to minimize harm. While the RGF provides a comprehensive approach to responsible gaming, Strategy 4 of the RGF addresses gambling marketing. Specifically, the RGF states that:

*Gaming licensees should develop and implement strategies to ensure advertising and promotions are delivered in a responsible manner. This includes advertising that is sensitive to concerns about youth exposure to gambling promotion, including casino marketing on non-age-restricted social casino apps or online free-play sites. An important aspect of responsible marketing is including messaging related to promoting positive play and advertising problem gambling help resources.*

The primary objectives of this strategy are to: 1) prevent underage gambling, 2) direct persons experiencing gambling-related harm to available resources, and 3) discourage people from playing beyond their means.

The American Gaming Association (AGA) has a [Responsible Gaming Code of Conduct](#) that was updated in 2018. The code applies to AGA member companies' advertising and marketing of casino gaming, including sports betting with a specific message to members to “advertise

responsibly”. The objectives of the advertising and marketing section of the code is in line with the Massachusetts RGF. In 2020 the AGA released a [Responsible Code for Sports Wagering](#). This version of the code provides additional details about location and placement of sports wagering advertising and messages, including controlling digital media and websites as well as a mechanism to monitor compliance.

## 2. An overview of relevant research findings

What is the effect of advertising on gambling behavior? Research on the effects gambling advertising has on gambling behavior is sparse, as opposed to comparable areas with more robust data, such as alcohol and tobacco (1, 2). Researchers have been challenged with determining the specific impact of gambling advertising on gambling-related harms, as advertising is only one of several environmental factors that may influence gambling behavior (3). Nonetheless, existing evidence suggests that exposure to gambling advertising is associated with more positive gambling related-attitudes, greater gambling intentions, and increases in gambling and problem gambling behavior (1). These patterns are consistent with those found in the fields of alcohol and tobacco, and electronic cigarettes (4-8).

While gambling in moderation may be thought of as not inherently harmful, it is an activity with a propensity for risks at higher frequency or amounts, and thus warrants regulation at the individual and the environmental level (9). Prior investigations on reducing harms associated with alcohol and tobacco use have found that restrictions on advertising, along with availability and pricing, is one of the most cost-effective measures (10) and might also be effective for gambling.

Gambling advertising should accurately represent gambling as an activity associated with risks, and not be overly enticing or glamorized so that people can make a fully informed decision. However, existing research indicates that gambling advertising usually presents gambling as a harmless, normal, and fun behavior (11-14). A community-based participatory research study in Massachusetts looking at the impact of MGM Springfield on Hispanic communities applied the data from their study to an explanatory model of problem-gambling, based on the concept of community-stress theory, and suggest that “The MGM casino, located in Springfield, uses advertisement and marketing strategies to offer hope combined with leisure and entertainment opportunities. These offerings could help release stress. For some residents, a visit to the casino can be an escape to cope with stress.” (15).

The overly positive framing of gambling in advertisements can reach and impact unintended populations. For example, a German research study with young people (13–25-year-old) found a positive correlation between exposure to gambling advertising and gambling frequency, noting that part of the central message being extracted by young people from the advertisements is that gambling leads to winning money and having fun (11).

Evidence has found that an early age of initiation is strongly associated with the development of problem gambling later in life and with greater severity of problem gambling (16, 17). Even though Massachusetts prohibits people under the age of 21 from gaming, underage people still find ways to gamble (18) and exposure to advertising may increase this risk (19).

People experiencing gambling problems have also been identified as a population particularly vulnerable to gambling advertisements and promotions. Research has found that people with gambling problems were significantly more likely than non-problem gamblers to be influenced by gambling promotions and incentives (20), and that advertising was a catalyst for people with gambling problems' relapse (1, 13, 14).

Similarly, a recently released prospective study of gaming and problem gambling in Massachusetts found a significant increase in problem gambling relapse in 2018. That period saw an increased number of news stories related to the planned opening of one of the Massachusetts casinos. The increased publicity and media attention in advance of the opening of the casino aligned with elevated rates of problem gambling, indicating that problem gambling relapses in Massachusetts was not likely due to physical availability to gamble, but rather could be due to the increased publicity and media attention in advance of the opening of the casino (21).

The same study identified demographic groups at higher-risk of experiencing gambling-related problems in Massachusetts, specifically males and lower income households (the latter is composed of mostly African Americans and Hispanics). One of the key recommendations in response to the study findings was to limit gambling advertising and availability, especially in lower socioeconomic neighborhoods, or to groups that may be at increased risk of experiencing gambling harms. (21).

Asian communities have also been identified as a population at greater risk of experiencing problems related to gambling (22, 23). As such, gambling advertising targeting Asian communities also deserves scrutiny. A recent study investigated the causes of problem gambling in the Asian Community in Boston's Chinatown and surrounding communities. This study found that people in the Asian community felt targeted by casinos to entice them into gambling through seductive marketing and advertising (24).

Gambling advertising can potentially reach many population groups, including young people and groups at higher-risk of experiencing gambling-related harms. There is a need to balance this overwhelmingly positive representation of gambling with more accurate information on the low probability of winning and the risk of harm associated with gambling (14). Research has shown that gambling advertising has a potential impact on gambling behavior, independent of physical gambling location. Careful consideration is needed in terms of the content, and distribution of gambling advertising.

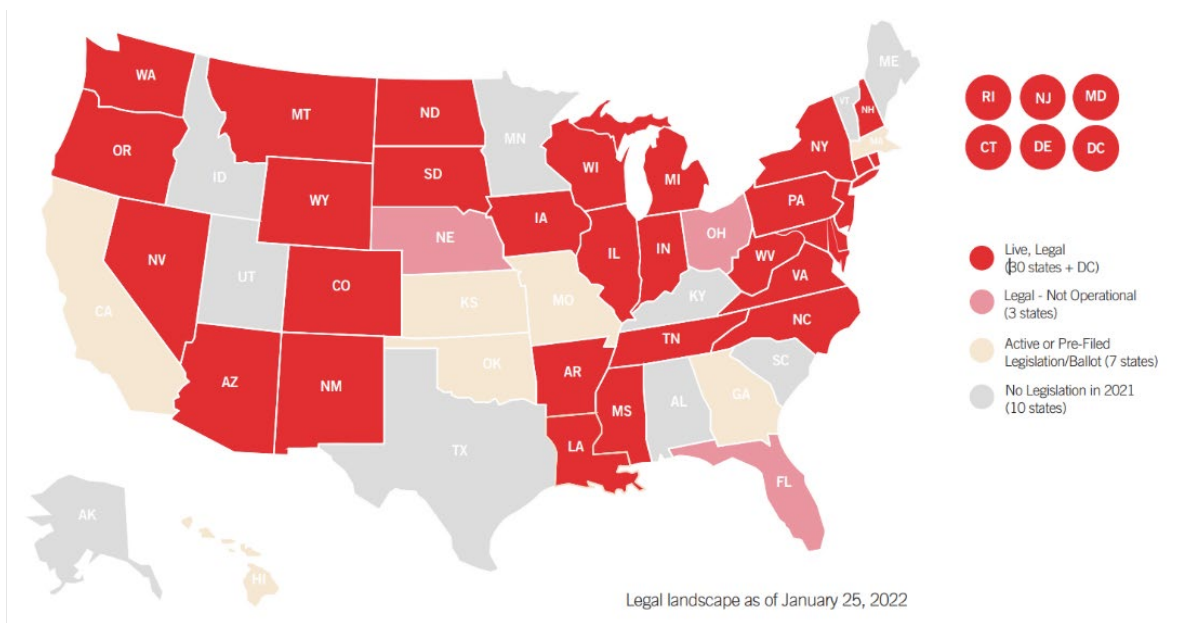
**Based on existing evidence in this area, future direction of the MGC Research Agenda should include:**

- Measuring the impact of gambling advertising on the Massachusetts population, with specific attention to persons under the legal gambling age and groups at higher-risk of experiencing gambling-related harms.
- Conducting research to monitor the impact of the changes in gambling advertising regulation, gambling behavior and gambling harms.
- Exploring the reach and impact of newer modes of gambling advertising, such as via the internet and social networks.

### 3. A review of select regulations in the US and other jurisdictions

As of January 2022, in the United States, all the states but two, Utah and Hawaii, have legalized gambling. Of the 48 states that have legalized gambling, 33 states and the District of Columbia have legalized sports betting. Only three states out of the 33 that legalized sports betting, Florida, Ohio, and Nebraska have not operationalized sports betting (Fig. 1).

**Figure 1. American Gaming Association’s map of Legal Sports Betting in the US (25)**



In 2021, when *The Marketing Moment: Sports, Wagering, and Advertising in the United States* was published, there were only 13 states and District of Columbia that have legalized sports betting. This paper is specific to the general advertising regulations on gambling, however, with 20 states legalizing sports wagering within one year of publication and the limited body of research on gambling advertising, the paper reviews regulations pertaining to sports wagering (26).

Shatley, Ghararian, Benhard, Feldman, and Harris found that regulations for sport wagering advertising in the United States can be divided into three main categories: responsible gaming messaging, target audience, and content.

The first category of regulations in the United States, responsible gaming messaging, all 14 states require a toll-free problem gambling helpline be featured on all marketing materials (Table 1).

In the second category, target audience, all 14 states have regulations prohibiting marketing that targets individuals on self-exclusion lists and those below the legal age to gamble. However, District of Columbia extends advertising prohibitions to those who *“are considered moderate and high-risk groups for gambling addiction.”*

The final category, content, of the 14 states that legalized state-regulated sports betting, only eight states include advertising requirements prohibiting operators from engaging in false or misleading advertising and adhere to standards of good taste and decency.

However, there are some jurisdictions that extended requirements beyond the three main categories such as regulating the placement or frequency of sports wagering advertising and an approval process for sports wagering advertising.

There are two jurisdictions that extended requirements to include regulation around the placement or frequency of sports wagering advertising. District of Columbia prohibits the placement of advertising within *“two (2) blocks of any of the designated Class A Sports Wagering Facilities.”* Tennessee regulations stipulate *“advertisements shall not be placed with such intensity and frequency that they represent saturation of that medium or become excessive.”*

Finally, the two states that require advertising to be submitted to the regulatory agency in advance for approval prior to publication or dissemination are Tennessee and West Virginia.

**Table 1. States/Jurisdiction’s specific gaming advertising regulations (26, 27)**

<b>Regulation Category</b>	<b>States/Jurisdictions</b>	<b>Regulation</b>
Helpline Messaging	NV, NJ, WV, PA, RI, IA, OR, IN, NH, IL, MI, CO, DC, TN, NY, OH, CT, LA, FL, MA*	Toll-free problem gambling hotline featured on marketing materials across variety of media
Target Audience	NV, NJ, WV, PA, RI, IA, OR, IN, NH, IL, MI, CO, DC, TN, WY, NC, CT, MA, Ontario	Prohibits marketing that targets individuals on self-exclusion lists and those below the legal age to gamble
	DC, Ontario	Prohibits marketing to “those considered moderate and high-risk groups for gambling addiction”

	Ontario	Prohibits all public advertising, including targeted advertising and algorithm-based ads
Content	CO, DC, IA, NV, NJ, PA, IL, TN, WY, MS, OH, CT, AR, Ontario	Prohibits operators from engaging in false or misleading advertising and require to adherence to standards of good taste and decency
	DC, CT	Advertising content must not “ <i>encourage players to chase their losses or re-invest their winnings</i> ” or “ <i>suggest that betting is a means of solving financial problems</i> ”; mandates advertising provide “ <i>balance message with regard to winning and losing</i> ”
	TN, CT	Requires advertising to avoid claims that gambling will “ <i>guarantee an individual’s social, financial, or personal success</i> ”
	Ontario	Gambling inducements, bonuses, and credits must not be described free unless the inducement, bonus, or credit is free. If the player has to risk or lose their money or if there are conditions attached to their own money, the offer must disclose those terms and may not be described as free.
Placement	DC	Prohibits advertising within “ <i>two (2) blocks of any of the designated Class A Sports Wagering Facilities</i> ”
	TN	Prohibits advertising on any medium that is “ <i>exclusively devoted to responsible gaming</i> ”
Frequency	TN	“ <i>Advertisements shall not be placed with such intensity and frequency that they represent saturation of that medium or become excessive</i> ”
Approval Process	TN, WV, DE	Requires advertising be submitted to the regulatory agency in advance for approval prior to publication or dissemination

\*Massachusetts statute: 2011 Massachusetts Acts 194, Section 9(a)(8) and Section 21(a)(17).

Because regulations on gambling advertising tend to be general and brief, this paper will also draw on insights and experiences from the alcohol industry self-regulations on advertising (Table 2).

**Table 2. The Alcohol Industry’s Self-Regulatory Codes and practices in the US, from the 2014 Federal Trade Commission (28):**

	<b>Practices</b>
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Online and Other Digital Marketing	<p>“Age-Gated”: consumer must enter date of birth showing legal age status or certify being 21+ before entry into site is permitted</p> <ul style="list-style-type: none"> <li>• Company websites are age-gated</li> <li>• Facebook age-gated; limiting alcohol company page viewing and “likes” to persons registered as 21+ and delivering alcohol ads only to persons registered</li> <li>• Twitter age-gating tool: customized pop-up age gate</li> <li>• Not all companies are taking advantage of age-gating technologies offered by YouTube</li> </ul>
	<p>Consumers are generally advised:</p> <ul style="list-style-type: none"> <li>• Online registration opportunities</li> <li>• How information will be used</li> <li>• Consumers opt-in to receive further communications</li> <li>• Have ability to readily opt-out when they want to stop receiving marketing information</li> </ul> <p>Company websites include privacy policies that are lengthy and difficult to understand</p>
	<p>Use of cookies and tracking tools on brand websites appears limited to permit re-entry of consumers who previously provided date of birth or determine optimal site content and facilitate browsing within a site</p>
External Review of Complaints	A procedure for external review of complaints regarding alcohol advertising

Finally, this paper will draw on advertising regulations from the Massachusetts’ Cannabis Control Commission, which regulates medical use and adult recreational use of marijuana (Table 3).

**Table 3: Massachusetts Cannabis Control Commission’s Prohibited Practices Regulations (29, 30):**

Regulations	Medical Use of Marijuana (935 CMR 501)	Adult Use of Marijuana (935 CMR 500)
Prohibits advertising in such a manner that is deemed to be is deceptive, misleading, false or fraudulent, or that tends to deceive or create a misleading impression, whether directly or by omission or ambiguity	✓	✓
Prohibit use of unsolicited pop-up advertisements on the internet or text message; unless advertisement is a mobile device application installed on the device by the owner of the device who is a Qualifying Patient or Caregiver or 21 years of age or older and includes a permanent and easy opt-out feature	✓	
Prohibit operation of any website of a Marijuana Establishment that fails to verify that the entrant is 21 years of age or older		✓

Prohibit advertising by means of television, radio, internet, mobile applications, social media, or other electronic communication, billboard or other outdoor Advertising, or print publication, unless at least 85% of the audience is reasonably expected to be 21 years of age or older or comprised of individuals with debilitating conditions, as determined by reliable and current audience composition data		
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#### 4. Considerations for additional strategies and measures regarding gambling advertising

Existing MGC regulations provide protection for persons under the age of 21, and participants in the voluntary self-exclusion program. Though it doesn't have the force of regulation, the *MGC Responsible Gaming Framework* and the *AGA Responsible Gaming Code of Conduct* add additional guidance to operators for higher-risk audiences and content.

Based on evidence supporting the need for additional measures, and the evolving advertising landscape discussed in this paper, we recommend that the MGC consider the following actions. Where feasible and consistent with statute, we recommend select measures be promulgated into regulations. Measures which are difficult to monitor and/or measure, maybe better suited for inclusion in the MGC Responsible Gaming Framework as it provides an overall orientation to responsible gaming for licensees. Certainly, the particulars of these recommendations would, if pursued, require refinement.

##### 1) Strengthen MGC regulations by adding the following requirements:

- Restrict advertising and marketing campaigns that disproportionately target groups identified by empirical evidence to be considered at higher-risk of experiencing gambling-related harm;
- Require that MGC approved GameSense, Safer Gambling Education, and/or problem gambling helpline messaging be incorporated into all casino advertising and marketing materials;
- Prohibit advertising placed with such intensity and frequency that it saturates that communication medium, or in some cases, location;
- Ensure that any advertising restrictions include messages placed in digital media, including third-party internet and mobile sites, commercial marketing emails or text messages, social media sites and downloadable content;
- Prohibit advertising that is false, misleading or encourages risky gambling behavior, such as advertising which:
  - Encourages players to chase their loss or re-invest their winning;

- Suggests that gambling is a means of solving financial problems or way to pay bills;
- Suggest that gambling can solve personal or professional problems
- Guarantees winning or social, financial, or personal success.
- Imply that chances of winning increase the longer one plays or the more one spends
- Suggests that skill can influence outcome (for games where skill is not a factor)
- Strengthen protections to avoid advertising to underage populations, such as:
  - Should not advertise by means of television, radio, internet, mobile applications, digital or online media, or other electronic communications, billboard or other outdoor advertising, or print publication, unless at least 85% of the audience is reasonably expected to be 21 years of age or older as determined by reliable and current audience composition data;
  - Should not feature anyone who is, or appears to be, under the age of 21;
  - Should not contain images or likeness, symbols, role models, and/or celebrity/entertainer endorsers whose primary appeal is to minors, themes or language designed to appeal specifically to those under the age of 21;
  - Suggest that gaming is a rite of passage;
  - Should not be placed before any audience where the majority of the viewers or participants is presumed to be under the age of 21, including college sports venues and digital and online media;
  - Should not use unsolicited pop-up advertisements on the internet or text message; unless the advertisement is a mobile device application installed on the device by the owner of the device who is 21 years of age or older and includes a permanent and easy opt-out feature;
  - Should verify that entrant on website is 21 years of age or older.
- Advertising and marketing materials that communicate gambling inducements, bonuses and credits must;
  - Not be described as free unless the inducement, bonus or credit is free. If the player has to risk or lose their own money or if there are conditions attached to their own money, the offer must clearly disclose those terms and may not be described as free.
  - Not be described as risk-free if the player needs to incur any loss or risk their own money to use or withdraw winnings from the risk-free bet.

## **2) Establish a compliance process**

Following a model developed by the American Gaming Association, we recommend the MGC establish a complaint process for suspected violations of MGC advertising regulation.

The [MGC's Fair Deal](#) tip line could include a mechanism to file a complaint, in various languages, about licensee's advertising and marketing practices which potentially violate MGC regulations.

We further recommend that the MGC establish an Advertising Review Advisory Committee (ARAC) to review marketing and advertising complaints that are submitted to Fair Deal. The ARAC should include representation from the MGC, external expertise, and representatives from the community, if appropriate.

The complaint review process should offer the licensee an opportunity to respond to the complaint, including the licensee's assessment of the claim's merit and any action taken in response.

If the ARAC determines there is sufficient evidence the licensee violated the MGC regulation, the matter should be elevated to an MGC adjudicatory hearing.

The ARAC may also be available to MGC licensees should they wish to discuss advertising strategies to assure compliance with MGC regulations and RGF guidelines.

### **3) Require awareness and capacity building training**

To promote safe and healthy gaming messages and ensure advertising materials are culturally appropriate, we recommend mandatory training for casino hosts and key positions identified with involvement in advertising or marketing. The training would include;

- A review of up-to-date relevant regulations and policies.
- An emphasis towards communities considered at higher-risk of experiencing gambling related harms. The Commission may wish to consider the Massachusetts' Culturally and Linguistically Appropriate Services (CLAS), for the purpose of ensuring diversity and inclusion including, but not limited to race, gender, age, sexual orientation, education, ethnicity, socio-economic status, and veteran status.

### **4) Update the MGC Responsible Gaming Framework and Sports Wagering Whitepaper**

To keep up with the evolving landscape, we suggest updating the *MGC Responsible Gaming Framework (2018)* and *Applying Principles of the Massachusetts Responsible Gaming Framework to Sports Wagering Policy and Practice(2021)*, to strengthen the content and recommendations, especially regarding gambling advertising. The updated RGF would provide more accurate and timely recommendations for gaming practices and policies to the MGC and gaming licensees.

### **5) Conduct research to inform regulations, training, and problem gambling programs**

Finally, because there is ambiguity on the impact gambling advertising has on Massachusetts residents, we recommend the MGC add to the research agenda studies which investigate:

- The impact of gambling advertising on the Massachusetts population, with specific attention to groups at higher-risk of experiencing gambling related harms, such study should seek to obtain a larger sample size than that captured in the community-driven research referenced in this paper.
- The impact of the changes in gambling advertising regulation, on gambling behavior and gambling harms.
- The reach and impact of newer modes of gambling advertising, such as via the internet and social networks.
- The correlation between gambling advertising and increased gambling-related harms among Massachusetts residents and specifically higher-risk populations.

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