

# RESPONSIBLE GAMING FRAMEWORK

VERSION 2.0 | MARCH 2018



# ***MISSION STATEMENT***

The mission of the Massachusetts Gaming Commission is to create and maintain a fair, transparent, and participatory process for implementing the expanded gaming law passed by the Legislature and signed by the Governor in November, 2011.

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





# **TABLE OF CONTENTS**

<b>INTRODUCTION</b>	<b><u>4</u></b>
<b>GAMBLING BEHAVIOR IN MASSACHUSETTS</b>	<b><u>6</u></b>
<b>GUIDING VALUES AND APPROACH</b>	<b><u>9</u></b>
<b>GOAL AND OBJECTIVES</b>	<b><u>12</u></b>
<b>STRATEGIES</b>	<b><u>13</u></b>
<b>1: COMMIT TO CORPORATE SOCIAL RESPONSIBILITY</b>	<b><u>14</u></b>
<b>2: SUPPORT POSITIVE PLAY</b>	<b><u>16</u></b>
<b>3: PROMOTE PUBLIC HEALTH AND SAFETY WITHIN         THE PHYSICAL ENVIRONMENT</b>	<b><u>21</u></b>
<b>4: ENSURE RESPONSIBLE MARKETING</b>	<b><u>24</u></b>
<b>5: MANAGE HIGH-RISK FINANCIAL TRANSACTIONS</b>	<b><u>26</u></b>
<b>6: ENGAGE THE COMMUNITY</b>	<b><u>28</u></b>
<b>7: COMMIT TO CONTINUOUS IMPROVEMENT AND         REPORTING</b>	<b><u>30</u></b>
<b>EVALUATION ON RESPONSIBLE GAMING INITIATIVES</b>	<b><u>31</u></b>
<b>ACKNOWLEDGMENTS</b>	<b><u>34</u></b>
<b>ENDNOTES</b>	<b><u>35</u></b>



# INTRODUCTION

The Responsible Gaming Framework is intended to inform gaming regulation in Massachusetts and provide an overall orientation to responsible gaming practice and policy adopted by the MGC and gaming licensees. The Framework is not designed to function as a regulation, but to guide the Commission’s decisions as it promulgates regulation and develops programs and practices to support responsible gaming. The Responsible Gaming Framework is based on the commitment by the MGC and its licensees to the guiding value of ethical and responsible behavior.

The Responsible Gaming Framework provides an approach through which licensees can ensure their general gaming practices are consistent with the Commission’s expectations that gaming in the Commonwealth will be conducted in a manner to minimize harm.

The MGC Responsible Gaming Framework supports the implementation of the expanded gaming law ([Chapter 194 of the Acts of 2011, M.G.L. chapter 23K, or “the Gaming Act”](#)) of the Commonwealth of Massachusetts. The legislation includes a number of key mandates to ensure the successful implementation of expanded gaming including, protection for host and surrounding communities and the prevention and mitigation of social impacts and costs. For further information about Massachusetts’ public health response to expanded gaming view the [Strategic Plan: Services to Mitigate the Harms Associated with Gambling in Massachusetts](#).

## Responsible Gaming

The provision of gambling services designed to encourage players to maintain their gambling at a healthy level and minimize harm to consumers and the community.<sup>1</sup>

## Problem Gambling

Difficulties in limiting money and/or time spent on gambling which leads to adverse consequences for the gambler, others, or for the community.<sup>2</sup>



# GAMBLING BEHAVIOR IN MASSACHUSETTS

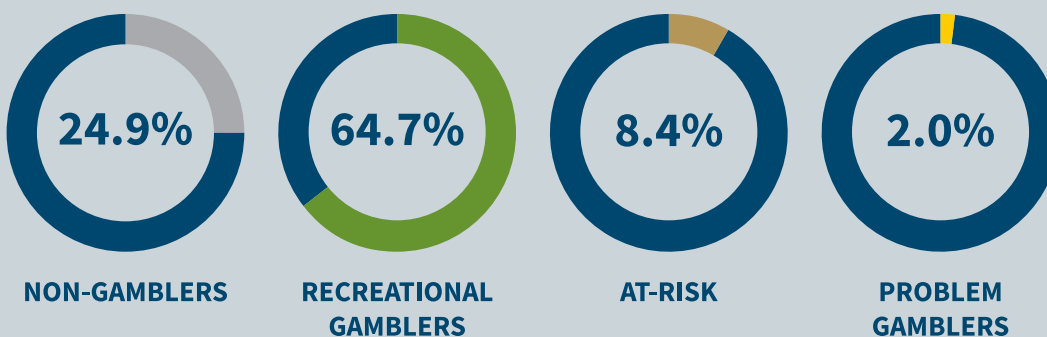
The MGC has funded and will continue to fund [studies](#) to better understand the impact of expanded gambling in Massachusetts and to evaluate efforts to reduce gambling related harm. Key study areas include, but are not limited to, social, economic, lottery, real estate, public safety, traffic and employment impacts of expanded gaming.

One such study was the [Baseline General Population Survey](#) conducted to assess gambling behavior and problem gambling before any of the state’s new casinos became operational. In late 2013 and early 2014, 9,578 Massachusetts residents responded to questions about their gambling behaviors over the previous 12-months. This study found:

- 24.9% of the population does not gamble, 34.6% gamble yearly, 20.4% gamble monthly, and 18.1% gamble weekly.



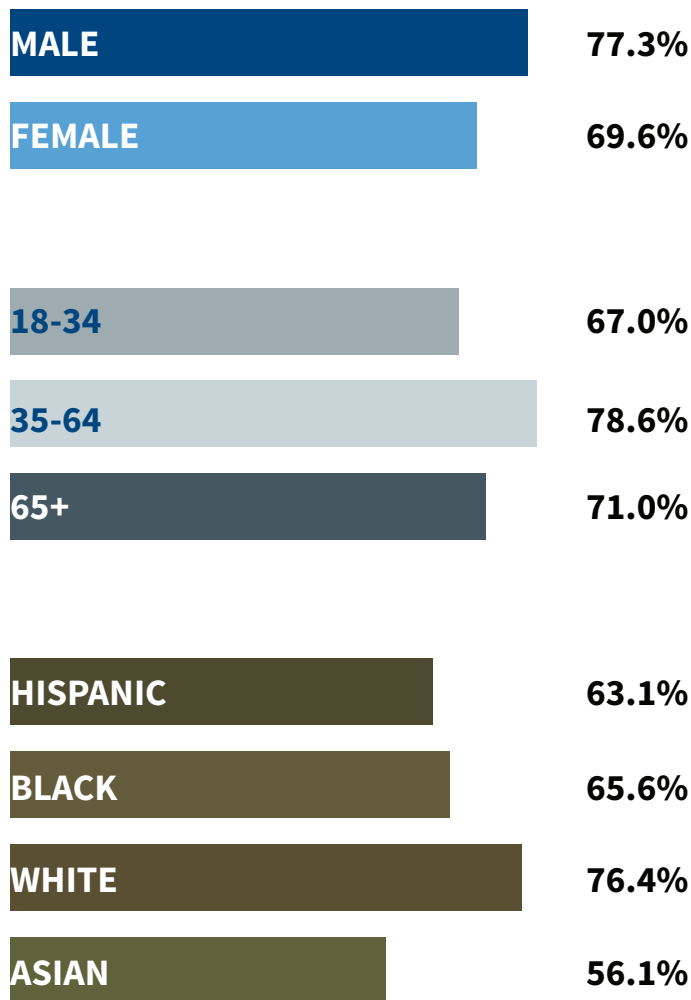
- Of Massachusetts adults who do gamble, just under one quarter (21.5%) report visiting casinos to gamble.
- The prevalence of problem gambling in Massachusetts is 2.0% of the adult population with an additional 8.4% of the population considered to be at-risk. Based on these percentages combined with July 1, 2017 U.S. Census estimates, it is estimated that 109,483 adult residents are problem gamblers, and 459,827 adult residents are at-risk gamblers.



There are significant differences in overall gambling participation associated with gender, age, race/ethnicity, education, employment, income level, and geographic region. Notably:

- Men are more likely to gamble than women
- Adults aged (25-64) are more likely to gamble than younger adults (18-24) or older adults (65+)
- Whites are more likely to gamble than Hispanics, Blacks, or Asians
- Nearly 2 in 10 Massachusetts adults (18.5%) reported knowing someone who they considered gambled too much.

## PERCENTAGE WHO GAMBLE



In 2015, the first adult longitudinal cohort study of gambling and problem gambling was launched in Massachusetts. The following data highlights changes between Wave I (2013/2014) and Wave II (2015) of the cohort (n=3,096).

**INCIDENCE:**

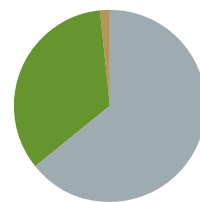
The problem gambling incidence rate within the cohort from 2013/2014 to 2015 in Massachusetts (prior to the opening of any casinos) was 2.4%.

**TRANSITIONS, STABILITY, AND CHANGE:**

The MAGIC study examined whether respondents moved from one risk category to another and, if so, whether they moved towards less severe or more severe problems.

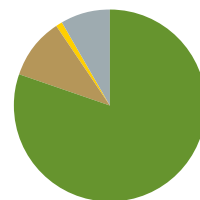
**NON-GAMBLERS IN WAVE I**

64.4% of remained in this category in Wave II.  
 34.1% moved into the Recreational Gambler category.  
 1.5% moved into the At-Risk Gambler category.\*  
 0.0% moved into the Problem/Pathological Gambler category.



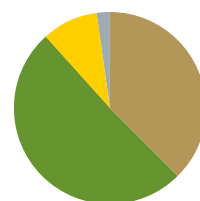
**RECREATIONAL GAMBLERS IN WAVE I**

80.3% of remained in this category in Wave II.  
 10.4% moved into the At Risk Gambler category.  
 1.0% moved into the Problem/Pathological Gambler category.  
 8.3% moved into the Non-Gambler category.



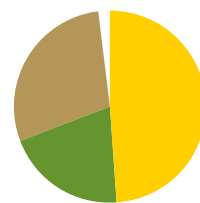
**AT-RISK GAMBLERS IN WAVE I**

37.5% remained in this category in Wave II.  
 50.9% moved into the Recreational Gambling category.  
 9.6% moved into the Problem/Pathological Gambler category.  
 2.0% moved into the Non-Gambler category.\*



**PROBLEM/PATHOLOGICAL GAMBLERS IN WAVE I**

49.4% remained in this category in Wave II.  
 20.3% moved into the Recreational Gambling category.  
 29.1% moved into the At-Risk Gambler category.



\*Indicates estimates are unreliable, relative standard error >30%





# **GUIDING VALUES AND APPROACH**

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

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

To this end, the MGC Responsible Gaming Framework aims is to create an effective, sustainable, measurable, socially responsible, and accountable approach to gaming. This Responsible Gaming Framework is buttressed by the MGC's annual research agenda. Information obtained from MGC sponsored research informs the strategies and tactics described within this Responsible Gaming Framework.

The Responsible Gaming Framework has adopted an evidence-based approach to responsible gaming measures where sound research or evidence is available. Where evidence is lacking, uncertain or ambiguous, and there is reasonable concern that gambling related harm may occur, a precautionary approach has been applied. The precautionary approach rejects the notion that risks are acceptable until harm has been proven or that risks can continue unmitigated until the effectiveness of a harm minimization measure is proven. Responsible gaming measures will be evaluated and information from those evaluations will be used to continually improve responsible gaming practices and programs. Responsible gaming efforts in their entirety will retain flexibility to respond to emerging evidence, and the evolving technological and cultural environment.

The MGC Responsible Gaming Frameworks generally follows a stepped care approach towards harm prevention. This approach suggests the riskier or more problematic the playing behavior, the more focused the intervention needs to be resulting in a hierarchy of potential interventions ranging from information provision to casino exclusion.

As gaming regulators, the MGC Responsible Gaming Framework’s focus is on gaming Licensees’ practices. However, the MGC believes Licensees do not have an isolated role in minimizing the potential harm of gambling. Government, science, industry, media, and gaming consumers must all take part to most effectively minimize harm caused or exacerbated by gambling.

## Stepped Care Approach

The Responsible Gaming Framework is organized into seven broad strategies. To carry out these strategies, licensees should apply a stepped care approach to maximize positive player outcomes. A stepped care approach recognizes that players differ from one another, as each player plays in a different manner and is to a different degree susceptible to harm. This means that there should be a hierarchy of potential interventions designed for different player groups, ranging from a focus on promoting positive play, to providing access to self-management tools and help resources, to offering casino exclusion.<sup>3</sup>

### POSITIVE PLAYERS

Focus on promotion and prevention by providing access to information, advice and self-help resources

### AT-RISK PLAYERS

Increase early intervention through access to tools and resources to support positive play.

### PROBLEM PLAYERS

Improve access to programs and services to prevent escalation and maximize recovery.

# The Precautionary Approach

The current knowledge base regarding the effectiveness of responsible gaming interventions is limited. In this context, whilst an evidence-based approach is desirable, it is not always possible. Moreover, from a practical perspective, it will not always be desirable or possible for the MGC to defer regulatory decisions until definitive evidence is available to support a particular intervention or technology. Under such circumstances a precautionary approach is warranted.

In essence, the precautionary approach ‘recognizes that the absence of full scientific certainty shall not be used as a reason for postponing decisions where there is a risk of serious or irreversible harm’.<sup>4</sup> The precautionary approach ‘gives primacy in policy debates to those upon whom the risk of harm is imposed’. It contrasts with approaches that prioritize the rights of those who would impose risks on others.<sup>5,6</sup>

## KEY POINTS

The Precautionary Approach:

- ‘recognizes that the absence of full scientific certainty shall not be used as a reason for postponing decisions where there is a risk of serious or irreversible harm’.
- ‘gives primacy in policy debates to those upon whom the risk of harm is imposed’. It contrasts with approaches that prioritize the rights of those who would impose risks on others.



# GOAL AND OBJECTIVES

**GOAL:** To create an effective, sustainable, measurable, socially responsible and accountable approach to gaming.

## REGULATORY OBJECTIVES:

- Minimize harm from gambling to individuals, families, and communities while serving the good of the Commonwealth and gaming licensees.
- Promote best and promising responsible gaming practices in all aspects of licensee activities.
- Utilize principles of responsible gaming in introducing all new and emerging technologies.

## RESEARCH OBJECTIVES:

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

## EDUCATION OBJECTIVES:

- Provide accurate and balanced information to promote positive play.
- Provide patrons adversely affected by gambling with timely access and appropriate information on problem gambling; and counsel to where assistance in dealing with such matters can be obtained.
- Create a shared understanding of responsible gaming practices among individuals, communities, the gambling industry and the government.



# STRATEGIES

The Responsible Gaming Framework compels the MGC Licensees to implement responsible gaming strategies, with a particular focus on prevention and player protection.

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

- 1. Commit to corporate social responsibility**
- 2. Support positive play**
- 3. Promote public health and safety within the physical environment**
- 4. Ensure responsible marketing**
- 5. Manage high-risk financial transactions**
- 6. Engage the community**
- 7. Commit to continuous improvement and reporting**

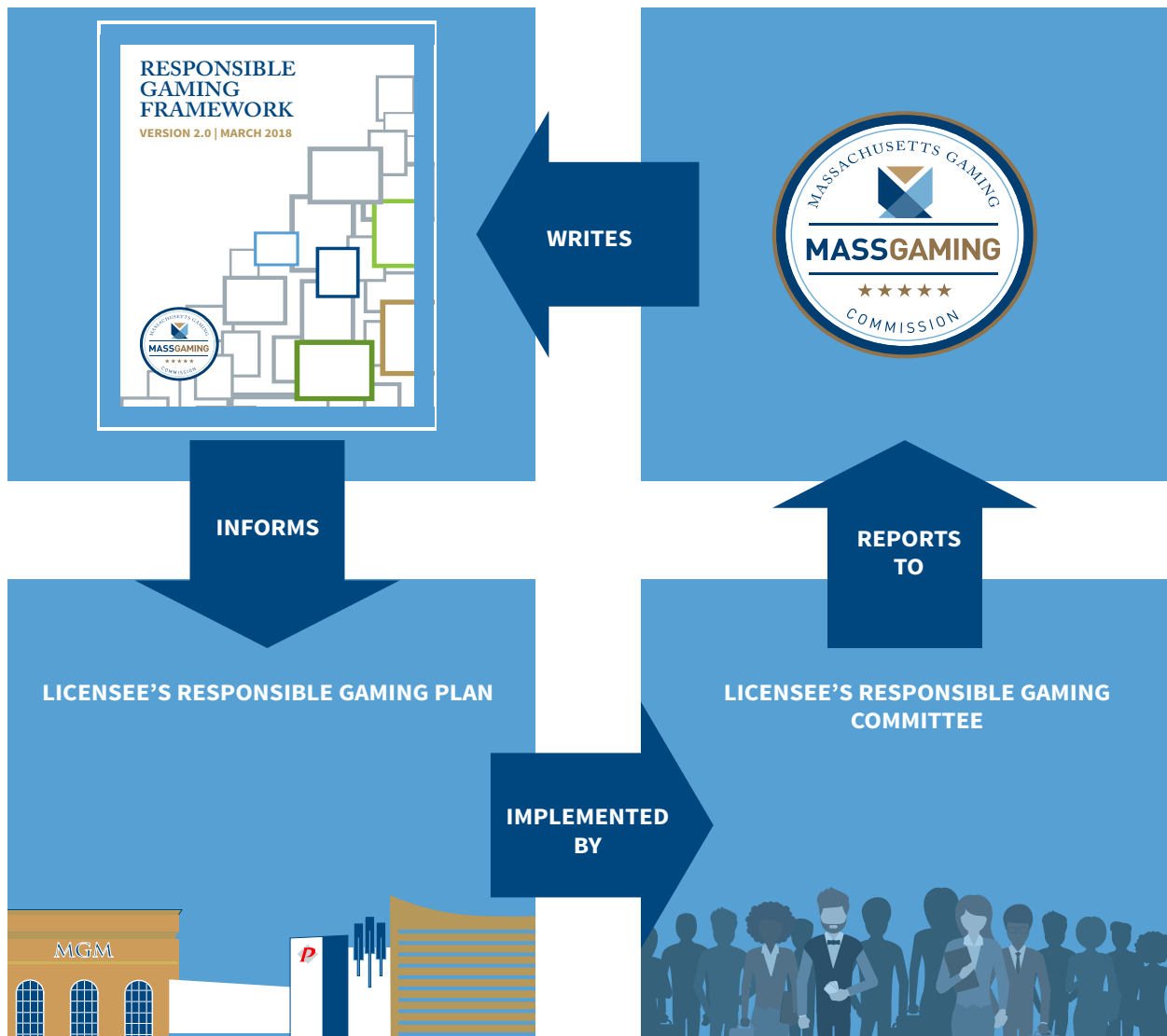
Each strategy contains a number of related practices. MGC Licensees are responsible for ensuring their commitment to the relevant practices and compliance with related regulations. The Responsible Gaming Framework, strategies, and practices, will be monitored and evaluated regularly by the MGC for effectiveness and fidelity. Where appropriate, policies and practices will be promulgated into regulation.

Responsible gaming strategies and practices will continue to evolve in response to innovation and new evidence related to problem gambling and responsible gaming. The MGC Responsible Gaming Framework strategies and practices will be periodically reviewed and revised.

# STRATEGY 1 2 3 4 5 6 7

## COMMIT TO CORPORATE RESPONSIBILITY

The aim of Corporate Social Responsibility is to minimize the negative environmental and social impacts and maximize the positive impacts. Social responsibility, sustainability, consumer protection and product safety are central to public confidence and therefore need to constitute a core business approach driven from the top by strong corporate leadership, built into business purpose and strategy, and woven into the organization's culture. For MGC licensees, attention to responsible gaming broadly and the GameSense program specifically, is an important component of a larger commitment to Corporate Social Responsibility. To demonstrate a commitment to promoting responsible gaming and addressing problem gambling, it's important that each MGC Licensee include responsible gaming policies within their code of ethics, create a Responsible Gaming Committee, and implement a Responsible Gaming Plan.



### **1.1 RESPONSIBLE GAMING COMMITTEE**

Each Licensee shall establish a Responsible Gaming Committee comprised of members from leadership positions. Each Licensee's Responsible Gaming Committee is responsible for maintaining compliance to the practices and policies described in their Responsible Gaming Plan and reporting their findings to the MGC.

### **1.2 RESPONSIBLE GAMING PLAN**

Each Licensee's Responsible Gaming Plan should reflect the strategies outlined in the MGC Responsible Gaming Framework and include detailed practices and procedures for assuring effective implementation of their Responsible Gaming Plan by conducting internal audits, surveying employees, and reviewing relevant data on a regular basis. Licensee Responsible Gaming Plans shall include commitments specific to licensee operations in order to:

- Provide ongoing education to employees about responsible gaming and their role in promoting a responsible gaming environment inclusive of the requirement that all employees participate in MGC approved responsible gaming employee training programs.
- Reduce the risk of employee gambling related problems through policies and practices inclusive of educational programs and resources for employees in need of assistance.
- Ensure that an appropriate level of awareness relating to responsible gaming is maintained throughout the licensed organization and key contractors, so that responsible gaming is made an integral part of daily operations.
- Provide employees with clear statements of expectations and responsibilities including an emphasis on the importance of employees in promoting responsible gaming and creating a healthy gaming environment.
- Designate responsible gaming duties for senior management and other leadership positions.
- Support and collaborate with on-site GameSense programs and initiatives.

## **STRATEGY 1 2 3 4 5 6 7**

### **SUPPORT POSITIVE PLAY**

The majority of casino patrons engage in “positive play” or in other words exhibit no problems or concerns with their gambling. To help players to avoid persistent negative play experiences, efforts are in place to support continued positive play including programs that enable patrons to have the information they need to make informed gambling decisions. This includes information on behaviors, attitudes, and motivations of players that show no signs of at-risk or problem gambling behavior as well as information about how games work. For persons who are unable to maintain positive play, Licensees must offer information about problem gambling and options for help. Programs to support positive play are expected to continually evolve as new information and technologies become available. Licensees and others have a role to innovate and assure programs and materials that support positive play and address problem play are woven into gaming establishment practices and policies.

## Positive Play

Positive Play is when a player undertakes positive playing experiences and holds attitudes and beliefs that do not put them at risk for developing gambling problems. More specifically, this means only spending what is affordable to lose and sticking to personally allocated spend and time limits (formal or informal). Responsible play includes honesty and openness with self and others about personal gambling habits. Belief in luck or other superstitions may be present, but they do not have a significant negative impact on play. There is recognition that gambling will always involve some degree of chance.<sup>8</sup>



## 2.1 INFORMED DECISION MAKING<sup>9</sup>

Informed decision making requires that patrons have the information they need to make gambling decisions. The Informed Decision Making framework, based on the stepped-care approach, specifies three separate information strategies aimed at three different primary gambler types:

- **Casual Gamblers** may benefit from programs that enhance their gambling literacy – i.e., how gambling works and low risk gambling guidelines.
- **Frequent Gamblers** may benefit from a deeper understanding of how gambling works such as electronic gaming machines (EGMs) use of random number generators, probabilities and odds for table games, as well as information dispelling common gambling myths.
- **Intensive Gamblers** may benefit from information about their play activity, the use of self-assessment tools and the options available for help.

If individuals move from casual, to frequent, to intensive gambling, these changes have important implications for information objectives, content and delivery. The objective for the casual gambler is to promote basic gambling literacy; for the frequent gambler to promote self-awareness of one's gambling, and for the intensive gambler is to provide cautionary information and raise awareness of options to reduce risk. Information guided by the Informed Decision-Making Framework should be made available through a variety of practices and methods including displaying materials throughout the gaming establishment utilizing Play Information and Management Systems and the accessibility to the GameSense Info Center.

## 2.2 PLAY INFORMATION AND MANAGEMENT SYSTEMS

Informed player choice is enhanced through the use of voluntary play information and management systems. The current system, branded as PlayMyWay, serves as a budgeting tool designed to allow patrons the ability to monitor the amount of money they spend on electronic gaming machines, and to inform their decision to continue or stop play. The PlayMyWay tool is intended to help players make decisions about their gambling, allow them to monitor and understand their gambling behavior in real time, and provide information to support their choices. The current system enables players to voluntarily choose to set loss amounts that trigger simple pop-up reminders when they approach their pre-determined budget. Additionally, the current system provides players with access to daily, weekly and monthly statements including the total bets, wins, and losses; tips on maintaining positive play, and information on how to access assistance. The MGC utilizes third-party evaluation data to continually improve the systems effectiveness. As new information becomes available from evaluation efforts and research from the broader field, the MGC will explore refining and adding system features such as enabling players with the option to compare their perceptions and beliefs about their gambling with information collected by the system to display the actual time they played, their actual wins and losses, and how that compares to system wide player group averages.



### 2.3 GAMESENSE INFO CENTER

Each gaming establishment is required to provide a GameSense Info Center to serve as an on-site responsible gaming resource staffed by third-party vendors contracted through the MGC. To receive maximum visibility, each establishment's GameSense Info Center is located near a high traffic gaming area of the casino to serve as the patrons' central point of contact for information about programs to support positive play including: Information about play management tools and enrollment assistance, educational tools to provide personalized feedback, materials on low risk gambling guidelines, and information on how games work. The GameSense Info Center also serves as a primary location to obtain information on resources and programs to assist players and their family members for when gambling becomes a problem. Individuals can learn about and enroll in voluntary self-exclusion programs at the GameSense Info Center. GameSense Advisors will be available during peak hours and individuals will have access to a phone where they can call the 24-hour Massachusetts Problem Gambling Helpline (1.800.426.1234).



## 2.4 VOLUNTARY SELF-EXCLUSION

As required by statute, Voluntary Self-Exclusion programs are available to assist patrons who recognize that they have experienced a loss of control over their gambling and wish to invoke external controls. Licensees will inform the public and make available to patrons different forms of Voluntary Self-Exclusion including:

- Exclusion from marketing lists including Licensee’s social casino sites;
- Exclusion from receiving house-credit and/or check cashing privileges; and
- Physical exclusion from MGC-licensed gambling venues state-wide.

Additionally, the MGC will investigate the feasibility, and effectiveness of offering patrons the ability to exclude themselves from ATM usage located on Licensee property and participation in regional casino exclusion programs.

The Self-Exclusion process utilizes an engaged approach, ensuring that the patron obtains the assistance needed, is responded to in a respectful, timely, discreet manner, and feels supported. Licensees will set mechanisms and procedures in place to support an engaged approach during all aspects of the self-exclusion service including enrollment, enforcement, and assisting individuals that attempt or break their agreement. Gaming wins and losses by banned individuals will be transferred to the MGC Gaming Revenue Fund.

Individuals utilizing the Voluntary Self-Exclusion Program will select the duration of their self-exclusion. At any time after the expiration of the selected duration of exclusion, an individual may request that their name be removed from the voluntary self-exclusion list by participating in a reinstatement session. During this brief session, the following topics will be covered: safe gaming tips, risks of gambling, and referrals to additional help, as appropriate.

# OPT-OUT

# STRATEGY 1 2 **3** 4 5 6 7

## PROMOTE PUBLIC HEALTH AND SAFETY WITHIN THE PHYSICAL ENVIRONMENT

MGC Licensees' commitment to corporate social responsibility extends beyond what is traditionally thought of as responsible gaming provisions to broader daily operations designed to promote public health and safety. The majority of the below listed protections are codified into state law and are provided here to demonstrate the scope of measures taken to provide public protections within the physical environments managed by Licensees.

### 3.1 PREVENT UNDERAGE GAMBLING

Licensees shall implement policies and practices designed to prevent legally underage persons from participating in any gambling at casinos, loitering in the gaming area of a casino or betting area of a racetrack or from gaining access to online, mobile or in-room gambling opportunities. Licensees should take all reasonable steps to ensure that staff understands their responsibilities in preventing underage gambling. Gaming wins and losses by underage persons will be transferred to the MGC Gaming Revenue Fund.



### 3.2 PROVIDE PROTECTIONS AGAINST CHILD AND ELDER NEGLECT OR AMANDONMENT

Licensees shall establish policies and practices to safeguard children and dependent elderly from neglect or abandonment by patrons including:

- Discourage patrons from bringing dependents within close proximity to the gaming floor.
- Increase patron awareness of policies and practices designed to protect children and dependent elderly.
- Place signage in parking areas explicitly disallowing unattended dependents in vehicles.
- Monitor premises and motor vehicles parked within Licensee's grounds.
- Clearly indicate to patrons and staff those areas within the property where minors are and are not allowed.
- If aware of a patron violating child or elder endangerment laws while gambling at their facility, the Licensee should notify local law authorities and consider banning the patron from the property.

### **3.3 CREATE SMOKE-FREE ENVIRONMENTS**

To maintain a safe and healthy work environment for all employees and patrons, Licensees will establish and enforce a prohibition of smoking in all enclosed areas of the gaming establishment, and prohibit the use of e-cigarettes in accordance with local regulation.

### **3.2 SERVE ALCOHOLIC BEVERAGES RESPONSIBLY**

Licensees will observe a responsible beverage service policy including making a diligent effort to:

- Not serve alcoholic beverages to a minor.
- Not serve alcoholic beverages to a visibly intoxicated patron.
- Not permit casino gambling by a visibly intoxicated patron.
- Escort visibly intoxicated persons from the gaming area.
- Prohibit the distribution of alcoholic beverages during hours determined by the MGC
- Ensure that appropriate casino employees are trained in the company's responsible alcoholic beverage service policy and provide periodic refresher training to those employees.

### **3.5 ASSIST PATRONS IN NEED**

Licensees should develop patron assistance policies and practices to appropriately identify, understand and respond to patron asking for assistance, exhibiting behaviors disruptive to others, displaying emotional distress, and showing symptoms of fatigue or medical needs. Patron assistance programs should be designed to collaborate with onsite resources, when appropriate, to offer aid to any patron in need with emphasis placed on developing training, procedures, and evaluation methods for assisting:

- Persons who appear to be experiencing a problem with their gambling.
- Individuals threatening harm to themselves or others.
- Persons displaying irrational behavior or speech.
- Suspected victims of human trafficking.

### 3.6 INCORPORATE RESPONSIBLE GAMING FEATURES INTO INTERNET AND MOBILE GAMING APPLICATIONS

As technology evolves and new tools and methods are developed that utilizes internet and mobile devices, licensees shall ensure that responsible gaming features are considered in the design, development, and delivery of gaming products and services, including:

- As gambling and gaming are converging in different ways, Licensees shall regularly consult with experts to discuss strategies for minimizing harms associated with any new and existing internet and mobile gaming products.
- Practice games should include information about responsible and problem gambling, be clearly labelled as for adult use only, and should not be advertised in a way that is appealing to youth.

### 3.7 ENCOURAGE BREAKS IN PLAY

To encourage breaks in play licensees should take the following measures:

- Display clocks in prominent locations in the gaming area to help patrons track the passage of time.
- Offer amenities including hospitality services and non-gaming forms of entertainment in areas on and off the gaming floor.
- Encourage patrons to visit the GameSense Info Center.
- Train employees on when and how to encourage patrons to take breaks in play.
- Provide lounge or seating areas outside of a retail setting



### 3.7 ENFORCE THIRD-PARTY EXCLUSIONS

In an effort to protect individuals who manifest a severe gambling disorder and are unable or unwilling to exclude themselves from an MGC licensed gaming facility, third-party exclusions will be made available. Licensees will enforce the exclusion of individuals who are banned from gaming establishments by an entity other than the excluded individual.

# **STRATEGY 1 2 3 4 5 6 7**

## **ENSURE RESPONSIBLE MARKETING**

Licensees should develop and implement strategies to ensure advertising and promotions are delivered in a responsible manner and advertising 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. This is accomplished through several actions including:

- Integrating responsible gaming messaging into casino marketing materials.
- Participating in Responsible Gaming Education Week and Problem Gambling Awareness Month.
- Coordinating responsible gaming marketing efforts with the MGC and other entities promoting MGC sanctioned responsible gaming awareness efforts.

As a minimum standard for Licensee advertising and marketing, the below guidelines, adapted from the American Gaming Association's Code of Conduct for Responsible Gaming, should be followed.

For the purposes of this strategy, advertising and marketing includes, among other media, radio and television, print ads, direct mail, social media, billboards and Internet promotions.

### **4.1 ADVERTISING AND MARKETING CONSIDERATIONS**

Gambling advertising and marketing will:

- Contain a responsible gaming message and/or a toll-free help line number where practical.
- Reflect generally accepted contemporary standards of good taste.
- Make no false or misleading claims or create a suggestion that the probabilities of winning or losing at the various games offered by the casino are different than those actually experienced.



## 4.2 ADVERTISING AND MARKETING PROHIBITIONS

Gambling advertising and marketing will not:

- Contain images, symbols, cartoon figures, celebrity/entertainer endorsements and/or language directed to or intended to appeal specifically to persons below the legal age.
- Feature anyone who is or appears to be below the legal age to participate in gambling activity.
- Be placed before any audience where most of the audience is ordinarily expected to be below the legal age to participate in gambling activity.
- Be promoted on college or university campuses or in college or university publications.
- Be placed on billboards or other outdoor displays that are adjacent to schools or other primarily youth-oriented locations.
- Contain claims or representations that gambling activity will guarantee an individual's social, financial or personal success.
- Imply or suggest any illegal activity of any kind.
- Encourage people to play beyond their means.
- Exaggerate the chances of winning.
- Encourage excessive or irresponsible play.

# STRATEGY 1 2 3 4 5 6 7

## MANAGE HIGH-RISK FINANCIAL TRANSACTIONS

To reduce the risk of players spending more on gaming activities than they can afford, Licensees will take several measures to manage high-risk financial transactions including developing policies that ensure all legal, statutory, and regulatory requirements relating to financial transactions are implemented, with particular attention to the following:

### 5.1 HOUSE CREDIT

Gambling on borrowed money is considered a high-risk practice that necessitates consumer protections. The following safeguards are intended to assure that risks associated with issuing house credit are minimized:

- Credit worthiness of an applicant will be verified using MGC regulations.
- House credit will only be extended to patrons who qualify for a minimum \$10,000 threshold and will not exceed the amount requested by the patron.
- Credit applications will include an MGC approved problem gambling self-assessment.
- Credit officers will obtain verbal verification from credit applicants that they are comfortable losing up to the amount of credit requested and granted.
- House credit will not be offered to persons who self-identify as a problem gambler, place themselves on a voluntary credit suspension list, or are on public assistance.
- A temporary credit increase for a patron's single trip to the casino is restricted to 25% and limited to once every 30 days.
- Credit requests, including extensions, may not be accepted from patrons who are visibly intoxicated or exhibiting behaviors suggestive of impaired mental competency.



## 5.2 CASH AND CREDIT TRANSACTIONS

For many players, limiting access to cash on the gaming floor is an important strategy in supporting positive play. For patrons whose play has become problematic, preventing high risk cash and credit transactions to fund gambling is paramount in reducing personal financial harm. In addition to the below measures to manage high risk financial transactions, the MGC and Licensees will continue to explore technological solutions and innovative practices to prevent high risk transactions.

- Using credit cards to finance gambling results in high fees and interest rates charged by credit card institutions and may lead to serious debt problems. For these reasons, credit card transactions are not allowed for the purposes of gaming.
- To restrict access to cash while gambling, debit card transactions are not permitted to be initiated within 15 feet of the gaming area.
- Cashless gaming systems must follow current Gaming Laboratories International (GLI) standards and obtain MGC approval. Until determined to be safe by the MGC, “Smart Card” technology and other cashless gaming systems enabling players to transfer money from a bank account to their players card, for the purpose of gaming, are not allowed.
- Licensees are encouraged to participate in a ATM exclusion program that offers gamblers a way to block access to cash across ATMs within the gaming establishment, cash access kiosks, and booth services. ATM exclusion authorization forms should be widely available including at the GameSense Info Centers and player services.
- Licensees must develop and implement a system of internal controls relative to the acceptance of checks presented by patrons for gaming purposes. These controls must comply with MGC regulations that prohibit cashing government-issued checks or third party checks other than bank issued cashier’s checks or traveler’s checks.
- For payout wins where federal taxes must be reported, written information should be made available alerting patrons of the association between large wins and problem gambling.

# STRATEGY 1 2 3 4 5 6 7

## ENGAGE THE COMMUNITY

Community engagement is an important feature of corporate social responsibility. Engaging the community is a way to understand, engage in and act upon critical workplace, marketplace, and environmental issues. Licensees should connect at all possible levels from within their organization to integrate within host and neighboring communities' governing bodies, economic, social and environmental life. Focused efforts should be placed on building collaborations and partnerships with individuals and entities addressing problem gambling and health promotion.

### 6.1 ENGAGING COMMUNITIES WITHIN THE GAMING ESTABLISHMENT

Licensees should develop practices and programs to engage individuals and entities directly involved with the gaming establishment to innovate, educate, problem solve, and improve relationships.

- Establish policies and practices to gather patron comments and to respond to patron complaints.
- Provide opportunities for employees to anonymously voice relevant concerns or questions.
- Designate easy to access space within the casino property for a GameSense Info Center. Within the GameSense Info Center, Licensees will designate an office for private meetings between patrons with concerns related to their gambling and counselors or other staff trained in crisis intervention, mental health triage, and the facilitation of a self-exclusion process.
- Educate the public about how gaming machines work including differences between gaming machines offered and features of newly introduced games.
- Actively engage with MGC funded researchers to facilitate access to needed information and enhance the exchange of information between evaluators and licensees.

## 6.2 AT-LARGE COMMUNITY ENGAGEMENT

Partnerships and collaborations are based on shared responsibilities. For Licensees to do their part, they should utilize findings from MGC-sponsored research to inform their efforts to actively engage the community, promote broad-based citizen participation in addressing concerns, and strengthen community relationships.

- Regularly engage with the Massachusetts Council on Compulsive Gambling, the Massachusetts Partnership on Responsible Gambling, and other entities interested in issues related to problem gambling and responsible gaming.
- Utilize findings from MGC-sponsored research and Massachusetts Department of Public Health-funded problem gambling prevention and treatment programs to inform ethical and responsible practices.
- Respond to community requests for participation with events and representative inclusion in coalitions, boards, or other community organizations.
- Work collaboratively with the academic community to better understand the positive and negative impact of practices and policies through information exchange including providing researchers access to employees, patrons, and data bases.
- Engage in outreach activities aimed at developing relationships with relevant host and surrounding community organizations that provide problem gambling treatment and problem gambling prevention activities.

# **STRATEGY 1 2 3 4 5 6 7**

## **COMMIT TO CONTINUOUS IMPROVEMENT AND REPORTING**

All MGC Licensees are responsible for continually improving their responsible gaming strategies and practices and reporting on their accomplishments. To meet these objectives Licensees will:

- Maintain appropriate records relating to the practices in the Responsible Gaming Framework.
- Provide responsible gaming related updates throughout the year through participation within the Massachusetts Partnership for Responsible Gambling.
- Submit an annual Responsible Gaming Plan progress report according to MGC standards.
- Participate and cooperate with MGC-sponsored responsible gaming program evaluation research.
- Fully engage in responsible gaming program reviews conducted or sponsored by MGC.
- Utilize evaluation and review findings to strengthen responsible gaming practices.



# EVALUATION ON RESPONSIBLE GAMING INITIATIVES

The Massachusetts Gaming Commission has contracted with the Division on Addiction, Cambridge Health Alliance, to provide evaluation of three MGC responsible gaming initiatives as outlined in **STRATEGY 2: SUPPORT POSITIVE PLAY**. Findings from these evaluations are used to refine and update the initiatives to ensure the highest reasonable level of efficacy. The MGC considers evaluations to be essential to good program health and for this reason will fund evaluations on regular basis. The full evaluations which are referenced below can be accessed on the [MGC Research Agenda](#) webpage.

## GAMESENSE

The GameSense program at Plainridge Park Casino was available to casino guests at the time of the casino's grand opening in June 2015. While key program objectives have remained the same, program managers noted that there was a period of adjustment during the first six months which has levelled out as Advisors have refined their roles to be as effective as possible. The GameSense program has undergone multiple waves of evaluation with various data collection methodologies which ranged from an electronic checklist used by GameSense Advisors, GameSense Info Center visitor surveys, general casino patron surveys and casino staff surveys. Some key findings from Wave I and II of the evaluation include:



GameSense Info Center survey respondents who reported that by visiting GameSense, they learned strategies about how to keep gambling fun.



GameSense Info Center survey respondents who reported that their visit to GameSense enhanced their overall visit to Plainridge Park Casino.



GameSense Info Center survey respondents who reported that they would visit GameSense again.

## PLAYMYWAY

PlayMyWay was launched in June of 2016 to help players make decisions about gambling, allow them to monitor and understand their playing behavior in real time, and support their decisions. The First Year Analysis of the Program found that:



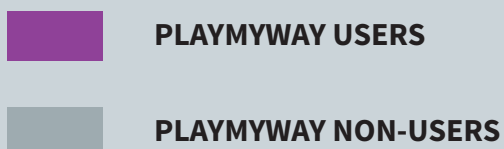
Of the 101,024 Plainridge Park Casino visitors who were eligible to enroll in the program during the study period, **8.8%** (8,856) enrolled in PlayMyWay.

PlayMyWay users tended to wager less money as well as lose less money per day compared to non-users. Whereas the median PlayMyWay-user wagered \$347.80 and lost \$47.50 per day, their non-user counterparts wagered \$485.30 and lost \$62.90.

### MEDIAN PER DAY WAGERED



### MEDIAN PER DAY LOST





## VOLUNTARY SELF-EXCLUSION

The Voluntary Self-Exclusion Program was launched just before the opening of Plainridge Park Casino in June 2015. Data collection consisted of an optional questionnaire which was included as part of the Voluntary Self-Exclusion form. Additionally, newly enrolled individuals were given the chance to participate in two more detailed surveys which were administered telephonically by researchers.

Key findings of the Preliminary Evaluation of the Massachusetts Voluntary Self-Exclusion Program include:



97% of Voluntary Self-Exclusion Program enrollees who participated in the study reviewed a resource packet with the enrolling agent.



88% of Voluntary Self-Exclusion Program enrollees who participated in the study reported that they had a better experience with the Massachusetts program than they did with other jurisdictions or states.



Enrollees who participated in the study experienced significant problems with their gambling and well-being upon enrollment. Six months after enrollment, their reported gambling problems declined and their reported well-being improved.

## **ACKNOWLEDGMENTS**

The development of the Massachusetts Gaming Commission Responsible Gaming Framework consisted of an extensive research process involving the review of a broad range of academic papers and studies, policy papers, investigative reports, jurisdictional reviews, corporate reporting documents, and legislation relating to gambling issues in Massachusetts, other United States jurisdictions, and abroad. From this review, materials produced by the following entities most notably informed the Framework:

- American Gaming Association
- Australian Gaming Council
- Australian Government Productivity Commission
- British Columbia Lottery Corporation
- Netherlands Ministry of Security and Justice
- New Zealand Department of Internal Affairs
- New Zealand Ministry of Health
- Nova Scotia Government (multiple agencies)
- Massachusetts Department of Public Health
- Ontario Problem Gambling Research Centre
- Ontario Responsible Gambling Council
- Queensland Government Office of Liquor and Gaming Regulation
- Responsible Gambling Strategy Board
- United Kingdom Gambling Commission

Scholarly papers of notable significance to the development of the Framework include:

- Blaszczynski, A., Collins, P., Fong, D., Ladouceur, R., Nower, L., Shaffer, H. J., & Vénisse, J. L. (2011). Responsible gambling: General principles and minimal requirements. *Journal of Gambling Studies*, 27(4), 565-573.
- Hancock, L., Schellinck, T., & Schrans, T. (2008). Gambling and corporate social responsibility (CSR): Re-defining industry and state roles on duty of care, host responsibility and risk management. *Policy and Society*, 27(1), 55-68
- Wood, R. T., & Griffiths, M. D. (2015). Understanding positive play: An exploration of playing experiences and responsible gambling practices. *Journal of gambling studies*, 31(4), 1715-1734.

Key to the refinement and updating of the Framework was input and information gathered from the Massachusetts Department of Public Health, Massachusetts Council on Compulsive Gambling, participants of the Massachusetts Partnership for Responsible Gaming, Problem Gambling Solutions, Inc., and other stakeholders from government agencies, the gambling industry, advocacy groups, academicians, not-for-profit organizations, and concerned citizens of Massachusetts.

## **ENDNOTES**

<sup>1</sup> McMillen, J., & McAllister, G. (2000, May). Responsible gambling: Legal and policy issues. In 3rd National Gambling Regulation Conference, Rex Hotel, Sydney (pp. 11-12).

<sup>2</sup> Neal, P. N., Delfabbro, P. H., & O'Neil, M. G. (2005). Problem gambling and harm: Towards a national definition.

<sup>3</sup> Adapted from: Ministry of Security and Justice (2014). Advice on the framework for the prevention of problem gambling and addiction: Final Report. Prepared by Gaming Integrity Services & Assissa Consultancy Europe for the Government of the Netherlands.  
<https://www.rijksoverheid.nl/binaries/rijksoverheid/documenten/rapporten/2015/04/03/tk-bijlage-advice-on-the-framework-for-the-prevention-of-problem-gambling-and-addiction/lp-v-j-0000007920.pdf>

<sup>4</sup> A Framework for the Application of Precaution in Science-based Decision Making and Risk', Government of Canada Privy Council Office, p.2.

<sup>5</sup> 'The Precautionary Principle', Centre for Progressive Regulation (CPR) (2003), p.3.  
<http://www.progressivereform.org/perspprecaution.cfm>

<sup>6</sup> Adapted from: Ministry of Security and Justice (2014). Advice on the framework for the prevention of problem gambling and addiction: Final Report. Prepared by Gaming Integrity Services & Assissa Consultancy Europe for the Government of the Netherlands.

<sup>7</sup> The Gaming Act requires that the Commission establish an “annual research agenda” in order to understand the social and economic impacts of expanded gaming in the Commonwealth. Research grantees will collaborate with gaming operators, governmental agencies, and others to meet research objectives.

<sup>8</sup> Positive Play Definition. R. Wood, personal communication, December 22, 2017.

<sup>9</sup> Responsible Gambling Council (2011). Insight 2010: Informed Decision Making. Ontario, Canada