



NOTICE OF MEETING AND AGENDA

Pursuant to the Massachusetts Open Meeting Law (G.L. c. 30A, §§ 18-25), and St. 2025, c. 2, notice is hereby given of a public meeting of the **Massachusetts Gaming Commission**. The meeting will take place:

Thursday | July 31, 2025 | 10:00 a.m.
VIA REMOTE ACCESS: 1-646-741-5292
MEETING ID/ PARTICIPANT CODE: 111 747 5882
All meetings are streamed live at www.massgaming.com.

Please note that the Commission will conduct this public meeting remotely utilizing collaboration technology. Use of this technology is intended to ensure an adequate, alternative means of public access to the Commission's deliberations for any interested member of the public. If there is any technical problem with the Commission's remote connection, an alternative conference line will be noticed immediately on www.massgaming.com.

All documents and presentations related to this agenda will be available for your review on the morning of the meeting date by visiting our website and clicking on the News header, under the Meeting Archives drop-down.

PUBLIC MEETING - #560

1. Call to Order – Jordan Maynard, Chair

2. Meeting Minutes

- | | |
|---------------------|-------------|
| a. January 20, 2023 | VOTE |
| b. July 1, 2024 | VOTE |
| c. July 24, 2024 | VOTE |
| d. July 15, 2025 | VOTE |

3. Research and Responsible Gaming – Mark Vander Linden, Director of Research and Responsible Gaming

- Presentation of report, "Sports Betting in Massachusetts: 2023 Economic Impacts Report" – Thomas Peake, Research Manager, Economic and Public Policy Research, UMass Donahue Institute
- Presentation of report, "Current Trends in Gambling, Sports Betting and Problem Gambling in Massachusetts, 2022-2024" - Rachel Volberg, Research Professor at University of Massachusetts Amherst; Principal



Massachusetts Gaming Commission

Investigator, Social and Economic Impacts of Gambling in Massachusetts
(SEIGMA)

4. Sports Wagering Division – Carrie Torrisi, Division Chief, Sports Wagering
 - a. House Rules Update
 - I. Fanatics **VOTE**
5. Legal – Justin Stempeck, Interim General Counsel
 - a. 205 CMR 239.07: Audit of Operator Operations by Commission – Discussion and Review of Regulation Amendment and Small Business Impact Statement for authorization to begin the promulgation process by Commission – Justin Stempeck, Interim General Counsel **VOTE**
 - b. 205 CMR 3.11: General Rules & 205 CMR 3.14: Licenses, Registrations and Fees for Participants in Racing – Discussion and Review of Regulation Amendments and Small Business Impact Statement for authorization to begin the promulgation process by Commission – Judith Young, Associate General Counsel **VOTE**
 - c. 205 CMR 248.12: Account Withdrawals – Discussion and Review of Regulation Amendment and Small Business Impact Statement for authorization to begin the promulgation process by Commission – Autumn Birarelli, Staff Attorney **VOTE**
6. Community Affairs Division – Joe Delaney, Division Chief of Community Affairs
 - a. Modifications to CMF Grants
 - I. City of Springfield Parking Authority 2020 Grant **VOTE**
 - II. Town of Saugus 2022 Public Safety Grant **VOTE**
 - III. Attorney General’s Office FY2026 Grant **VOTE**
7. Executive Session Minutes
 - a. Executive Session **VOTE**

The Commission anticipates that it will meet in executive session to review minutes from previous executive sessions as their discussion at an open meeting may frustrate the intended purpose for which the executive session was convened, pursuant to G.L. c. 30A, § 21(a)(4) and (7) and c. 4, § 7(26)(n):**September 18, 2023**; and G.L. c. 30A, § 21(a)(7) and c. 4, § 7(26)(n): **February 7, 2024**.

 - I. September 18, 2023 **VOTE**
 - II. February 7, 2024 **VOTE**



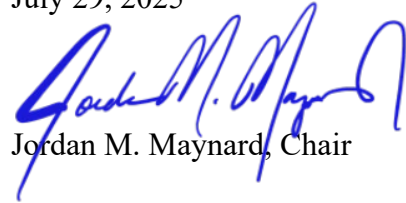
Massachusetts Gaming Commission

8. Commissioner Updates

9. Other Business - Reserved for matters the Chair did not reasonably anticipate at the time of posting.

I certify that this Notice was posted as “Massachusetts Gaming Commission Meeting” at www.massgaming.com and emailed to regs@sec.state.ma.us. Posted to Website: July 29, 2025 | 10:00 a.m. EST

July 29, 2025



Jordan M. Maynard, Chair

*If there are any questions pertaining to accessibility and/or further assistance is needed,
please email Grace.Robinson@massgaming.gov.*



Massachusetts Gaming Commission

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Massachusetts Gaming Commission Meeting Minutes

Date/Time: January 20, 2023, 11:00 a.m.
Place: Massachusetts Gaming Commission
VIA CONFERENCE CALL NUMBER: 1-646-741-5292
PARTICIPANT CODE: 112 738 1553

The Commission conducted this public meeting remotely utilizing collaboration technology. Use of this technology was intended to ensure an adequate, alternative means of public access to the Commission's deliberations for any interested member of the public.

Commissioners Present:

Chair Cathy Judd-Stein
Commissioner Eileen O'Brien
Commissioner Bradford Hill
Commissioner Nakisha Skinner
Commissioner Jordan Maynard

1. [Call to Order](#) (00:00)

Chair Judd-Stein called to order the 425th Public Meeting of the Massachusetts Gaming Commission ("Commission"). Roll call attendance was conducted, and all five commissioners were present for the meeting.

2. [Administrative Update](#) (01:32)

a. [Determination of Sports Wagering Category 1/Retail Launch \(Jan. 31\) Time](#) (01:39)

Karen Wells, Executive Director, noted that the Commission approved the launch of category one sports wagering operators on January 31, 2023. She recommended that sports wagering start at 10:00 A.M. on that date. The Commission reached a consensus that category one sports wagering would launch at 10:00 A.M. on January 31, 2023.

3. [Legal](#) (05:59)

a. [Sports Wagering Regulations](#): (06:07)

i. [205 CMR 256.00: Sports Wagering Advertising – Regulation and Small Business Impact Statement for review and approval to commence the promulgation process and/or adoption via emergency](#). (06:16)

Deputy General Counsel Carrie Torrisi introduced Outside Counsel Mina Makarious from the law firm Anderson and Krieger. Attorney Makarious presented proposed changes to 205 CMR 256. *A memorandum, draft of 205 CMR 256, and Small Business Impact Statement were included in the Commissioners' Packet on pages 3 through 14.*

Commissioner O'Brien asked if the prohibitions section of 205 CMR 256 would prevent advertising on television. Attorney Makarious stated that the proposed standards for advertising on television would be similar to Pennsylvania and New York's regulations.

Commissioner Hill asked Director of Research and Responsible Gaming Mark Vander Linden if he was satisfied with the proposed language from a responsible gaming perspective. Director Vander Linden stated that the language in the proposed regulation was not explicit regarding the required responsible gaming messaging. He expressed his preference that responsible gaming language should be consistent and directed by the Commission. Attorney Makarious noted that specific responsible gaming language would be included in another regulation.

The Commission had a robust discussion regarding whether 18- to 20-year-olds should be allowed to endorse sports wagering operators. Commissioner O'Brien and Commissioner Skinner expressed that those under the age of 21 should not be able to participate in the sports wagering industry. Commissioner Maynard noted that bets could be placed on these athletes and stated that he did not want to deprive the players of this financial opportunity. Commissioner Hill noted that athletes have a short career span, and that not allowing them to have endorsement deals could deprive the athletes of opportunities. Commissioner O'Brien expressed concern that this type of endorsement would target individuals under the age of 21. Chair Judd-Stein stated that she did not want to arbitrarily bar athletes from the possibility of profiting from an endorsement.

The Commission reached a consensus that the proposed language in the regulation would be changed to preclude minors from endorsing sports wagering operators in Massachusetts and preclude individuals aged 18 to 20 who are not professional athletes from endorsing sports wagering operators in Massachusetts.

Commissioner O'Brien moved that the Commission approve the Small Business Impact Statement and draft of 205 CMR 256 as included in the Commissioners' Packet and further discussed and amended here today, specifically in recognition of the edits on page 11 of the PDF of the Commissioners' Packet in regards to athletes under 21 and minor athletes, and further that staff be authorized to take the steps necessary to file the required documentation with the Secretary of the Commonwealth by emergency and thereafter to begin the regulation promulgation process and further that staff be authorized to modify chapter or section numbers or titles to file additional regulation sections as reserved or make any other administrative

changes as necessary to execute the regulation promulgation process. Commissioner Skinner seconded the motion.

Roll call vote:

Commissioner O'Brien: *Aye.*

Commissioner Hill: *Aye.*

Commissioner Skinner: *Aye.*

Commissioner Maynard: *Aye.*

Chair Judd-Stein: *Aye.*

The motion passed unanimously, 5-0.

ii. [205 CMR 239.00: Continuing Disclosure and Reporting Obligations of Sports Wagering Licensees - Regulation and Small Business Impact Statement for review and approval to commence the promulgation process and/or adoption via emergency.](#) (1:05:25)

Attorney Makarious presented the proposed 205 CMR 239. *A memorandum, draft of 205 CMR 239, and Small Business Impact Statement were included in the Commissioners' Packet on pages 15 through 25.*

Commissioner Skinner asked if the reporting requirement in 205 CMR 239.03(1)(h) would also apply to the licensee's parent company. Attorney Makarious stated that the regulation included the affiliated parent company, and that the language in the regulation was identical to the language used in 205 CMR 139.

General Counsel Todd Grossman stated that 205 CMR 239.03(7) could be removed as counter checks were a form of credit, and credit was not a valid payment for sports wagering. Attorney Makarious stated that he would remove that portion of the regulation. Commissioner Skinner stated that there was an incorrect citation in 205 CMR 239.06(2). Attorney Makarious stated that he would edit and correct all typos and formatting errors.

Commissioner O'Brien moved that the Commission approve the Small Business Impact Statement and draft of 205 CMR 239 as included in the Commissioners' Packet and further discussed and amended here today, specifically to delete 205 CMR 239.03(7) and to fix specified numeration mistakes, and further that staff be authorized to take the steps necessary to file the required documentation with the Secretary of the Commonwealth by emergency and thereafter to begin the regulation promulgation process and further that staff be authorized to modify chapter or section numbers or titles to file additional regulation sections as reserved or make any other administrative changes as necessary to execute the regulation promulgation process. Commissioner Hill seconded the motion.

Roll call vote:

Commissioner O'Brien: *Aye.*

Commissioner Hill: *Aye.*

Commissioner Skinner: *Aye.*

Commissioner Maynard: *Aye.*

Chair Judd-Stein: Aye.
The motion passed unanimously, 5-0.

iii. [205 CMR 241.00: Surveillance and Monitoring – Regulation and Small Business Impact Statement for review and approval to commence the promulgation process and/or adoption via emergency.](#) (1:29:11)

Attorney Makarios presented the proposed changes to 205 CMR 241. *A memorandum, draft of 205 CMR 241, and Small Business Impact Statement were included in the Commissioner’ Packet on pages 26 through 29.*

Commissioner Hill moved that the Commission approve the Small Business Impact Statement and draft of 205 CMR 241 as included in the Commissioners’ Packet and discussed here today, and further that staff be authorized to take the steps necessary to file the required documentation with the Secretary of the Commonwealth by emergency and thereafter to begin the regulation promulgation process and further that staff be authorized to modify chapter or section numbers or titles to file additional regulation sections as reserved or make any other administrative changes as necessary to execute the regulation promulgation process. Commissioner Maynard seconded the motion.

Roll call vote:
Commissioner O’Brien: Aye.
Commissioner Hill: Aye.
Commissioner Skinner: Aye.
Commissioner Maynard: Aye.
Chair Judd-Stein: Aye.
The motion passed unanimously, 5-0.

iv. [205 CMR 255.00: Play Management – Regulation and Small Business Impact Statement for review and approval to commence the promulgation process and/or adoption via emergency.](#) (1:31:50)

Deputy General Counsel Torrisi introduced Outside Counsel Annie Lee from the law firm Anderson and Krieger. Attorney Lee presented the proposed changes for 205 CMR 255. *A memorandum, draft of 205 CMR 255, and Small Business Impact Statement were included in the Commissioners’ Packet on pages 30 through 37.*

Commissioner Skinner asked if 205 CMR 255.02(3) would prevent an operator from being able to voluntarily reimburse a patron. Director Vander Linden stated that the intention of the regulation was to align with requirements in 205 CMR 233 regarding voluntary self-exclusion (“VSE”). Commissioner Skinner stated that an operator had previously voluntarily returned wagers that should not have been placed when a technical error approved the wagers.

Director Vander Linden stated that play management tools were intended to assist individuals in setting a budget, but players could potentially circumvent them due to technical errors or having

multiple accounts. Attorney Makarios noted that 205 CMR 248 prohibited players having multiple accounts with an operator.

Commissioner Skinner expressed that she would like the language amended to allow the operators an option to voluntarily return funds. The Commission reached a consensus to amend the proposed 205 CMR 255 to allow operators the flexibility to voluntarily return funds to patrons.

Chair Judd-Stein noted that one operator had a company-wide limitation on deposits for customers aged 21 through 25. She stated that the regulation should be changed to allow the operators to have limitations in the interest of responsible gaming. Attorney Lee suggested that the language could be changed to “operators may subject patrons to limitations in their approved internal controls, otherwise the individual must affirmatively designate”.

Vice-President of Government Relations and General Counsel from Gaming Laboratories International (“GLI”) Kevin Mullaly stated that there might be technical challenges to providing notifications to the user that they are approaching their set limits. He stated that kiosks did not currently support this type of notification. He further noted that sports wagering operators might not be able to comply with the proposed requirement before launch.

Commissioner Skinner asked if notifications of approaching limits were required in other jurisdictions. GLI’s Vice President of Government Relations and Regulatory Affairs Joe Bunevith stated that no other jurisdiction required notification that the user was approaching their set limit. Chair Judd-Stein asked how long it would take for the operators to incorporate this feature. Mr. Bunevith stated that it would depend upon the operator as they all have different platforms.

Director Vander Linden suggested that the Commission staff could reach out to the operators to determine what features were able to be ready by the proposed launch date. He stated that the Massachusetts operators had always been good partners in developing responsible gaming and player management tools. Chair Judd-Stein suggested that the Commission take a break to allow the legal team to work on a solution for the notification issue.

Transcriber’s Note: The Commission took a brief break at [2:27:01](#) and reconvened the public meeting at [3:02:58](#).

Executive Director Wells stated that it was impossible to have the notification technology available on sports wagering kiosks for the January 31, 2023 category one sports wagering launch. Mr. Bunevith stated that it was also possible that the category three operators would not have the technology in place for the March launch. Commissioner O’Brien stated that the Commission could grant waivers until such time as the technology is implemented. Mr. Mullaly stated that the Commission could mandate that operators include compliance with the notification technology requirements in their internal controls.

Commissioner Hill stated that he did not believe this issue was ripe for consideration without more research and discussion with the operators. He suggested that the Commission hold off on

voting for this regulation. Deputy General Counsel Torrisi stated that the Commission could promulgate 205 CMR 255 through the ordinary process rather than by emergency to allow for the operators to provide input. Commissioner Maynard asked if this regulation needed to be finalized before the January 31, 2023 launch date. Deputy General Counsel Torrisi stated that it was not necessary for launch.

Commissioner Hill moved that the Commission table a vote on 205 CMR 255 and bring it back at some point in the very near future. Commissioner O'Brien proposed an amendment that the discussion of 205 CMR 255 return in 2 weeks. Commissioner Hill accepted the amendment. Commissioner O'Brien seconded the motion.

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Maynard: Aye.

Chair Judd-Stein: Aye.

The motion passed unanimously, 5-0.

v. [205 CMR 254.00: Temporary Prohibition from Sports Wagering – Revised Regulation for review and approval to post the updated version for comment.](#)
(3:50:33)

Attorney Lee presented the proposed changes for 205 CMR 254. *A memorandum, draft of 205 CMR 254, and Small Business Impact Statement were included in the Commissioners' Packet on pages 38 through 42*

Commissioner Maynard noted that the operators had indicated that they did not want to provide notifications to players that their cooling-off period is ending as it would risk enticing the player back to the platform. He asked if these notifications were used in other jurisdictions. Mr. Bunevith stated that these notifications are not provided in any other jurisdiction. He stated that it could be technically challenging for the operators to implement such notifications into their platforms.

Director Vander Linden stated that the notification could be used to provide players with responsible gaming options, including the option of enrolling in VSE, before re-entering the platform. Commissioner Maynard asked if the notification could just be a link to the responsible gaming portion of the Commission's website. Mr. Bunevith stated that including a link would be a less technically complex request.

Deputy General Counsel Torrisi stated that 205 CMR 254 was in effect by emergency, and that any language under review could be removed when it comes to the Commission for a final vote on February 9, 2023. Commissioner Maynard expressed that he did not believe this issue was ripe for consideration without more information from the applicants.

The Commission reached a consensus to post the proposed amended language to the Commission's website and to request public comment on the proposed changes.

Commissioner Hill noted that he had to leave the meeting at 4:00 P.M. and requested that the Commission move ahead in the agenda to consider the sports wagering events and wager catalog. Chair Judd-Stein stated that the Commission would discuss 205 CMR 213 at a future meeting so that the full Commission could consider the events catalog.

4. [Sports Wagering Implementation](#) (4:20:12)

a. [Continued Review and Approval of Sports Wagering Events Catalog](#) (4:20:19)

Sterl Carpenter, Regulatory Compliance Manager, presented the proposed sports wagering event catalog to be offered by the Commission with topics including wager types, approved events, and approved leagues. *The proposed sports wagering events catalog was included in the Commissioners' Packet on pages 47 through 88.*

Chair Judd-Stein asked if virtual events were different from Esports. Mr. Bunevith stated that was correct. He stated that the Commission could allow virtual events provided that the event is tested by an independent test lab in accordance with 205 CMR 247.01.

Mr. Carpenter explained that the category one retail operators had requested the events outlined in the packet, but all operators would be able to offer the events approved by the Commission. Chair Judd-Stein stated that online operators would have the opportunity for input.

Chair Judd-Stein asked if any wager-types were not recommended for approval. Mr. Carpenter explained that the Sports Wagering Division did not recommend virtual wagers decided by random number generation ("RNG"). He explained that the outcomes of those matches are generated by a computer algorithm that selects the winner in a non-biased way.

Commissioner Skinner stated that she did not feel prepared to discuss the event catalog without further information regarding why these wagers were recommended. Chair Judd-Stein asked if the events catalog needed to be approved in this meeting for the launch timeline. Executive Director Wells stated that it could be moved to a meeting on January 24, 2023. The Commission reached a consensus to have further discussions regarding the events catalog on January 24, 2023.

Mr. Carpenter stated that he wanted to raise some matters for the Commission to consider before the next discussion of this topic. He noted that if a league is approved, such as the NFL, wagers would be permitted on the league's pre-season and post-season games. He stated that the Commission could approve wagers for certain events, such as the NFL draft. Commissioner O'Brien asked if allowing wagers on the draft would be considered outside of the statute. Mr. Carpenter stated that the NFL draft could be interpreted as a sporting event. General Counsel Grossman clarified that the definition of sporting event in the statute included "other events authorized by the Commission in accordance with this chapter". He stated that the NFL draft

could be wagered on if approved. Chair Judd-Stein noted that a governing body would have to be approved before the Commission could approve wagering on Esports.

Commissioner O'Brien asked if other jurisdictions had their full catalog available upon launch, or if they expanded their offerings over time. Mr. Bunevith stated that event types were continually added to catalogs across all states. Commissioner Maynard stated that he would like input from the category three sports wagering operators before voting on the sports wagering catalog. Mr. Bunevith noted that several of the category one operators' event requests would likely align with their tethered category three operator partners. Director of Sports Wagering Bruce Band noted that the Commission could approve additional events and wagers when the category three operators requested them.

General Counsel Grossman inquired about how the governing body for different sports were identified. Mr. Carpenter stated that he researched the different sports governing bodies, and that staff relied on operators to provide a list of governing bodies with oversight over events.

Chair Judd-Stein asked what non-sports events were requested to be added to the events catalog. Mr. Carpenter stated that operators requested that wagers be allowed on the Academy Awards and two competitive eating events. He stated that operators also requested that chess, cornhole, Esports, and jai alai be added to the list of approved events.

Commissioner Skinner asked what would be posted to the Commission website to inform the operators and the public which events are allowed. Mr. Carpenter stated that the approved events would be posted to the Commission's website in an Excel spreadsheet format. Commissioner Skinner requested that the Commission staff prepare a justification for the event recommendations before the next discussion on this topic.

Transcriber's note: Commissioner Hill left the meeting prior to discussion of the next agenda item.

b. [Floor Plan Approvals – Retail](#) (5:21:30)

Director Band presented the proposed floor plans for each category one sports wagering applicant. *The proposed category 1 sports wagering applicants' floor plans were included in the Commissioners' Packet on pages 89 through 99.*

Commissioner Skinner asked what the difference would be in Plainridge Park Casino's ("PPC") temporary floor plan and their final floor plan. Director Band stated that PPC intended to convert Flutie's Sports Pub into a sportsbook. He stated that PPC would submit a final floor plan to the Commission for approval.

Commissioner O'Brien asked if the changes to MGM Springfield's ("MGM") floor plan for sports wagering would allow for open access to the gaming floor. Director Band stated that there would not be open access to the sports wagering areas. Commissioner O'Brien inquired about MGM's compliance with keeping underage individuals out of the gaming floor. Director Band stated that MGM's compliance had not been the best for the past month.

Commissioner O'Brien commented that she was still dubious of allowing wagers to be placed in Encore Boston Harbor's ("EBH") garage. Director Band stated that the garage location was enclosed by walls and had camera coverage. Commissioner O'Brien asked if there were any safety concerns related to the garage area. Director Band stated that he had contacted the Gaming Enforcement Unit and that they did not raise any concerns regarding the garage. Commissioner O'Brien stated that she would abstain from voting on EBH's floor plan until she received more details regarding the garage.

Commissioner Maynard moved that the Commission approve the floor plans submitted by the category one sports wagering operator Plainridge Park Casino as included in the Commissioners' Packet and discussed here today. Commissioner O'Brien seconded the motion.

Commissioner Skinner stated that it was not ideal to be approving a floor plan based upon a PDF image, but she recognized that there was a time constraint. She expressed that she would have preferred to visit each location, but that she was okay with voting based upon the Investigations and Enforcement Bureau's ("IEB") recommendation.

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Skinner: Aye.

Commissioner Maynard: Aye.

Chair Judd-Stein: Aye.

The motion passed unanimously, 4-0.

Commissioner O'Brien stated that her only concern regarding MGM's floor plan was regarding underage individuals accessing the gaming floor. She stated that she wanted updates from MGM regarding that topic. Director of the IEB Loretta Lillios stated that the Chief Enforcement Counsel's office was reviewing MGM's compliance and working with MGM on the underage access issue. She stated that there would be additional structural changes to address the open floor plan.

Commissioner Maynard moved that the Commission approve the floor plan submitted by the category one sports wagering operator MGM Springfield as included in the Commissioners' Packet and discussed here today. Commissioner O'Brien seconded the motion.

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Skinner: Aye.

Commissioner Maynard: Aye.

Chair Judd-Stein: Aye.

The motion passed unanimously, 4-0.

Commissioner O'Brien stated that she wanted to see photos of EBH's garage before voting on the floor plan. Commissioner Maynard expressed concern about the loss of parking spaces in times of high traffic volume.

Commissioner Maynard moved that the Commission approve the floor plans submitted by the category one sports wagering operator Encore Boston Harbor as included in the Commissioners' Packet and discussed here today. Commissioner Skinner seconded the motion.

Roll call vote:

Commissioner O'Brien: Abstain.

Commissioner Skinner: Aye.

Commissioner Maynard: Aye.

Chair Judd-Stein: Aye.

The motion passed unanimously, 3-0, with one abstention.

5. [Other Business](#) (6:00:29)

Hearing no other business, Chair Judd-Stein requested a motion to adjourn.

Commissioner O'Brien moved to adjourn. The motion was seconded by Commissioner Skinner.

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Skinner: Aye.

Commissioner Maynard: Aye.

Chair Judd-Stein: Aye.

The motion passed unanimously, 4-0.

List of Documents and Other Items Used

1. [Revised Notice of Meeting and Agenda dated January 19, 2023](#)
2. [Commissioner's Packet from the January 20, 2023, meeting](#) (posted on massgaming.com)



Massachusetts Gaming Commission Meeting Minutes

Date/Time: July 1, 2024, 11:00 a.m.

Place: Massachusetts Gaming Commission

VIA CONFERENCE CALL NUMBER: 1-646-741-5292

PARTICIPANT CODE: 112 530 9181

The Commission conducted this public meeting remotely utilizing collaboration technology. The use of this technology was intended to ensure an adequate, alternative means of public access to the Commission's deliberations for any interested member of the public.

Commissioners Present:

Interim Chair Jordan Maynard
Commissioner Eileen O'Brien
Commissioner Bradford Hill
Commissioner Nakisha Skinner

1. [Call to Order](#) (00:10)

Interim Chair Maynard called to order the 523rd Public Meeting of the Massachusetts Gaming Commission ("Commission"). Roll call attendance was conducted, and all four commissioners were present for the meeting.

Commissioner Hill requested that the Sports Wagering Division agenda item is covered first, before the Legislative Update. Interim Chair Maynard agreed without objections from the other commissioners.

2. [Sports Wagering Division](#) (01:25)

a. Operations Certificate for Launch of Category 3 Operator Bally Bet

Sports Wagering Business Manager Crystal Beauchemin stated that the Commission's staff reviewed the conditions required for the approval of the Operations Certificate in the case of Bally's Interactive ("Bally Bet").

Ms. Beauchemin noted that if Bally Bet received their approval for the Operations Certificate on the day of the meeting, they would intend to launch Bally Bet Sportsbook in the Commonwealth the following day, July 2, 2024, at 11:00 A.M. *A Memorandum regarding Bally Bet's certificate of operations was included in the Commissioners' Packet on pages 3 through 5.* She explained that in accordance with 205 CMR 251.01(3)(a), the house rules were verified by Sports Wagering Operations Manager Andrew Steffen and approved by the Commission on June 20, 2024.

Vice President of Director of Government and Regulatory Affairs of Gaming Labs International ("GLI") Joe Bunevith provided a detailed overview of the submittal, certification and verification process regarding the mobile application to the Commission for Bally Bet. He stated that the certification was issued when GLI verified the changes that were made for Massachusetts specific deployment. Furthermore, GLI found that the product met all Massachusetts requirements. Mr. Bunevith concluded by stating that GLI completed an entire internal control audit for Bally Bet.

Commissioner Skinner thanked Mr. Bunevith and requested that he provide a report, similar to this process in connection with other operators, detailing the categorized risks. Mr. Bunevith stated that he was not prepared at this time to complete a detailed walkthrough of said risks but confirmed that the process was connected with the internal controls. He noted that the report was provided to the Sports Wagering Division.

Interim Chair Maynard and Commissioner Skinner asked for clarification on the existence of any major issues within the report which would warrant the attention of the Commission. Mr. Bunevith stated that he did not see any apparent issues. He described the four parts of the internal control process: regulation, policy, procedure, and verification.

Senior Executive of Government Affairs of GLI Gabe Benedik assured the Commission that the compliance review of over 150 documents was done under both Massachusetts specific and GLI-33 rules and requirements. This process would be included in the report.

Commissioner Skinner clarified that the review conducted by GLI was not in question, just the results or any points that warranted further attention. Additionally, Commissioner Skinner noted that neither she nor the other Commissioners received the report and wanted to review the observations and categorizations to ensure that nothing stood out. Mr. Benedik replied by assuring full compliance and lack of observations that would raise concern.

Ms. Beauchemin stated that Executive Director Dean Serpa has signed off on the internal controls as required by 205 CMR 238.02(3). She stated that the completion of the requirements related to the occupational and vendor licenses in 205 CMR 251.03(b) was confirmed by Interim Chief Enforcement Counsel Kathleen Kramer and Chief of the Licensing Division Karalyn O'Brien. She further noted that the requirements in 205 CMR 251.03(c), (d) and (e) were not

mentioned in the materials provided, since they do not apply to Category 3 licensees, unlike the other items listed.

Ms. Beauchemin proceeded to review the requirements that fell under 205 CMR 251.01(3)(f), which requires compliance with any other conditions imposed by the Commission to secure the objectives of G.L. c. 23N and 205 CMR, and noted that the items were completed the Friday prior to the Commission meeting. Ms. Beauchemin further confirmed the completion of the 205 CMR 251.02 requirements for a test period.

Commissioner Skinner asked whether the vendors were already licensed or if they had submitted their applications. Director of the Investigations and Enforcement Bureau Caitlin Monahan stated that the full licenses had not been issued, but the temporary licenses had been issued.

Based on the completion of the requirements, Ms. Beauchemin, on behalf of the Sports Wagering Division, recommended the approval of the Certificate of Operations for Bally Bet, effective July 1, 2024, and requested a vote.

Commissioner Skinner moved that the Commission find that the requirements outlined in 205 CMR 251 have been satisfied and that an Operations Certificate be awarded to Bally's Interactive LLC for the purposes of operating a Category 3 Sports Wagering operation commencing July 2, 2024, conditional upon Bally's Interactive LLC completing operational audits of wagering procedures and practices and technical security controls as required by the Commission's technical standards governing Sports Wagering at 205 CMR 243.01(1)(s) and 205 CMR 243.01(1)(x) within 90 days of the commencement of Sports Wagering operations. Commissioner O'Brien seconded the motion.

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Interim Chair Maynard: Aye.

The motion passed unanimously, 4-0.

Interim Chair Maynard congratulated Bally Bet. Bally Bet's Director of Compliance Justin Black and Bally Bet's Chief Operating Officer Brett Calapp thanked the Commission on behalf of the Bally Bet team.

3. [Legislative Update](#) (24:46)

Commissioner Hill introduced the Economic Development Bill that the House of Representatives voted on and sent to the Senate. The bill did not include the language related to public records which was in the original economic development bill. Commissioner Hill briefly explained that one of the sections that was added to the bill, Section 124, allowed Suffolk Downs

to have a simulcasting facility at any location within the counties of Suffolk and Worcester if approved by the Commission.

Commissioner Hill also noted the amendment to Section 124A which involves the Greyhound Capital Improvement Trust Fund and the Greyhound Promotional Trust Fund. He stated his understanding that the trust funds have not been in place since 2009 and that all funds were allocated to the Racing Stabilization Fund. The latter ceased making payments around 2016, leaving up to \$600,000 in the fund.

Commissioner Hill described that Section 154 dealt with the Running Horse Capital Improvement Trust Fund which would affect Raynham and Suffolk. He stated that the amendment would allow a portion of the funds in the Trust to be returned to the two entities by the Commission. The fund held up to \$6,000,000, and the amendment would allow for both entities to receive some of the funds back and further allow them to stop paying into the fund going forward.

Commissioner Hill further mentioned a bill that would allow the Commission to continue holding public meetings remotely, with a requirement that the Chair or Chair's designee be physically present in the Commission's building.

Commissioner Skinner asked about the status of the Economic Development Bill at this point in the process. Commissioner Hill clarified that the bill was voted on by the House of Representatives and went to the Senate for their deliberation.

Interim Chair Maynard commented that having the public records law brought into compliance with G.L. c. 23K would be helpful for the operators and the Commission to do their work.

Director of Racing Dr. Alexandra Lightbown noted an amendment that would direct the Commission to pay unclaimed simulcast wagers back to the licensee that generated them, rather than those monies going towards the purse accounts. Dr. Lightbown affirmed the need for further meetings and monitoring of the bill due to its legal and financial implications. Commissioner O'Brien followed up on the commentary by noting that the amendments mentioned by Dr. Lightbown would appear to be in conflict with abandoned property laws in most other circumstances.

Interim Chair Maynard, regarding agenda item 2, asked if there were any other comments regarding Bally Bet. Commissioner Skinner welcomed Bally Bet to Massachusetts and expressed her appreciation to the Commission's team for their work.

4. [Commissioner Updates](#) (34:00)

After inquiry by Interim Chair Maynard, no commissioner updates were noted.

5. [Other Business](#) (34:04)

Hearing no other business, Interim Chair Maynard requested a motion to adjourn.

Commissioner Hill moved to adjourn. The motion was seconded by Commissioner O'Brien.

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Interim Chair Maynard: Aye.

The motion passed unanimously, 4-0.

List of Documents and Other Items Used

1. [Notice of Meeting and Agenda](#) dated June 27, 2024
2. [Commissioner's Packet](#) from the July 1, 2024, meeting (posted on massgaming.com)



Massachusetts Gaming Commission Meeting Minutes

Date/Time: July 24, 2024, 11:00 a.m.
Place: Massachusetts Gaming Commission

VIA CONFERENCE CALL NUMBER: 1-646-741-5292
PARTICIPANT CODE: 112 965 5493

The Commission conducted this public meeting remotely utilizing collaboration technology. The use of this technology was intended to ensure an adequate, alternative means of public access to the Commission's deliberations for any interested member of the public.

Commissioners Present:

Interim Chair Jordan Maynard
Commissioner Eileen O'Brien
Commissioner Bradford Hill
Commissioner Nakisha Skinner

1. [Call to Order](#) (0:00)

Interim Chair Jordan Maynard called to order the 526th Public Meeting of the Massachusetts Gaming Commission ("Commission"). Roll call attendance was conducted, and all four commissioners were present for the meeting.

2. [Investigations and Enforcement Bureau](#) (0:53)

Caitlin Monahan, Director of Investigations and Enforcement Bureau, requested an executive session to discuss security at the casino facilities, particularly fire-arm related security and security in the MGM garage.

Transcriber's note: Prior to entering executive session, the Commission discussed agenda item nos. 3 and 4.

a. [Security at the Casino Facilities Executive Session](#) (1:50)

Interim Chair Maynard read into the record that the Commission anticipated that it would meet in executive session in accordance with G.L. c. 30A, §21(a)(4), c. 30A, §21(a)(7), and G.L. c. 4,

§7(26)(f) to discuss the use and deployment of security personnel or devices, or strategies with respect thereto at Encore Boston Harbor, MGM Springfield and Plainridge Park Casino, specifically with regard to firearms and parking garage security; to discuss investigatory materials related to MGM parking garage security, necessarily compiled out of the public view by the IEB the disclosure of which materials would probably so prejudice the possibility of effective law enforcement that such disclosure would not be in the public interest; and to review draft letters to Encore Boston Harbor, MGM Springfield, and Plainridge Park Casino related to the same subject matter outlined herein. He stated that the public session of the Commission meeting would not reconvene at the conclusion of the executive session.

Commissioner O'Brien moved that the Commission enter executive session on the matter and for the reasons just articulated by the Interim Chair. Commissioner Hill seconded the motion.

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Interim Chair Maynard: Aye.

The motion passed unanimously, 4-0.

3. [Commissioner Updates](#) (1:26)

Interim Chair Maynard noted that there were no commissioner updates for today's meeting.

4. [Other Business](#) (1:33)

Upon inquiry from Interim Chair Maynard, no other business was noted.

Transcriber's Note: The Commission entered Executive Session and did not reconvene the public meeting of the Commission.

List of Documents and Other Items Used

1. [Notice of Meeting and Agenda](#) dated July 22, 2024



Massachusetts Gaming Commission Meeting Minutes

Date/Time: July 15, 2025, 10:00 a.m.

Place: Massachusetts Gaming Commission

VIA CONFERENCE CALL NUMBER: 1-646-741-5292

PARTICIPANT CODE: 111 534 0493

The Commission conducted this public meeting remotely utilizing collaboration technology. Use of this technology was intended to ensure an adequate, alternative means of public access to the Commission's deliberations for any interested member of the public.

Commissioners Present:

Chair Jordan Maynard

Commissioner Eileen O'Brien

Commissioner Bradford Hill

Commissioner Nakisha Skinner

Commissioner Paul Brodeur

1. [Call to Order](#) (00:00)

Chair Maynard called to order the 558th Public Meeting of the Massachusetts Gaming Commission ("Commission"). Roll call attendance was conducted, and all five commissioners were present for the meeting.

2. [Meeting Minutes](#) (00:45)

a. [May 22, 2023](#) (01:08)

The May 22, 2023 public meeting minutes were included in the Commissioners' Packet on pages 5 through 12.

Commissioner Skinner moved that the Commission approve the May 22, 2023 public meeting minutes as included in the Commissioners' packet, subject to any necessary corrections for typographical errors or other non-material matters. Commissioner O'Brien seconded the motion.

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Brodeur: Abstain.

Chair Maynard: Aye.

The motion passed unanimously, 4-0, with one abstention.

b. [June 17, 2025](#) (01:39)

The June 17, 2025 public meeting minutes were included in the Commissioners' Packet on pages 13 through 35.

Commissioner Skinner moved that the Commission approve the June 17, 2025 public meeting minutes as included in the Commissioners' packet and discussed here today, subject to any necessary corrections for typographical errors or other non-material matters. Commissioner O'Brien seconded the motion.

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Brodeur: Aye.

Chair Maynard: Aye.

The motion passed unanimously, 5-0.

3. [Administrative Update](#) (03:19)

Dean Serpa, Executive Director, stated that the Commission had received four Supplier Diversity Office ("SDO") awards at its annual awards ceremony in June. He stated that the Commission would have a small business support day to celebrate small and diverse Massachusetts businesses on July 16, 2025.

Executive Director Serpa noted that July 20, 2025 was the Spirit of Massachusetts Day at Plainridge Park Casino ("PPC"). He stated that it was an annual full day racing event with more than \$150,000 in purses throughout the day.

Executive Director Serpa announced that the Commission had concluded its search for the new Chief of the Human Resources ("HR") Division. He stated that the new HR Chief was Kathleen Buckley, and that she had a strong background in town, municipal, and state government HR. He stated that the HR Chief would begin working for the Commission on August 18, 2025. Chair Maynard thanked the HR Chief Search Committee for its work.

4. [Research and Responsible Gaming](#) (08:42)

a. [GameSense Quarterly Report](#) (08:42)

Director of Research and Responsible Gaming Mark Vander Linden introduced the Massachusetts Council on Gaming and Health's ("MACGH") CEO Marlene Warner; MACGH's COO of MACGH Michael Tuplin; MACGH's Director of Player Health Amy Gabrila; and MACGH's Director of Programs and Diversity, Equity, Inclusion, and Belonging ("DEIB") Shekinah Hoffman. The staff from MACGH presented the GameSense quarterly report with topics including funders; Q4 data highlights; voluntary self-exclusion ("VSE"); Champions Awards; outreach and engagement; diversity, DEIB training; reflections on 10 years of GameSense; and plans for fiscal year 2026. *The GameSense quarterly report presentation was included in the Commissioners' Packet on pages 36 through 58.*

Commissioner Skinner explained that she had attended a conference where a panel speaker made a comment that patrons are being deterred from enrolling in the VSE program in Massachusetts because of the length of time it takes for the enrollment process to be completed. She requested that GameSense return to the Commission at a future meeting to discuss the VSE enrollment process and what it entails. Mr. Tuplin stated that GameSense advisors focus on meeting people where they are. He stated that the enrollment process can vary in time depending on the client. He thanked Commissioner Skinner for raising this issue and stated that it would be reviewed.

Commissioner Skinner asked if GameSense Advisors provided referrals to resources or services related to mental health. Ms. Gabrila stated that GameSense was compiling a comprehensive support and resource package that could be distributed to patrons, and that GameSense intended to make that information available.

5. Sports Wagering Division (1:06:50)

a. Encore Boston Harbor Request for Permanent Waiver from Letter of Credit Required by 205 CMR 238.12 (1:07:06)

Chief of Sports Wagering Carrie Torrisi explained that Encore Boston Harbor ("EBH") had requested a permanent waiver from the requirement that they have a letter of credit in accordance with 205 CMR 238.12. *A memorandum and EBH's waiver request were included in the Commissioners' packet on pages 59 through 65.*

Chief Torrisi explained that the Commission discussed the letter of credit requirement at length and given the operators an opportunity to provide input. She explained that EBH argued that its minimum cash on hand was sufficient to cover its sports wagering liabilities. She noted that this argument was previously raised and rejected by the Commission. She stated that cash on hand does not meet the intent of the requirement in 205 CMR 238.12.

Commissioner Hill moved that in accordance with 205 CMR 202.03(2), the Commission deny the request from Encore Boston Harbor for a permanent waiver from the letter of credit requirement of 238.12, as detailed in the materials in the Commissioners' Packet and as discussed here today. Commissioner Brodeur seconded the motion.

Roll call vote:

Commissioner O'Brien: Aye.
Commissioner Hill: Aye.
Commissioner Skinner: Aye.
Commissioner Brodeur: Aye.
Chair Maynard: Aye.

The motion passed unanimously, 5-0.

6. Investigations and Enforcement Bureau (1:25:55)

a. Review of the IEB's Recommendation of Assessment of a Civil Administrative Penalty Pursuant to 205 CMR 232.02(2) regarding noncompliance with permissible sports wagering offerings by BetFair Interactive LLC d/b/a FanDuel

Enforcement Counsel Diandra Franks presented a proposed civil administrative penalty in the amount of \$15,000 for BetFair Interactive LLC d/b/a FanDuel ("FanDuel"). She explained that the Investigations and Enforcement Bureau ("IEB") briefed the Commission regarding this noncompliance incident on October 24, 2024. She stated that FanDuel had offered wagering on the PGA under the assumption that it was connected to the approved PGA league. She noted that these were two separate golf entities. She stated that 7,155 total wagers were accepted in the amount of \$78,254. She stated that the IEB recommended that the Commission assess a \$15,000 civil assessment on FanDuel.

Commissioner Skinner asked why the IEB did not increase the assessment based upon the prior \$20,000 penalty issued to FanDuel for allowing wagers on non-approved markets. Counsel Franks stated that each non-compliance matter is reviewed based upon factors including the type of violation, amount of wagers, and previous decisions. She stated that each recommendation is based upon a specific set of circumstances. She stated that the recommended \$15,000 civil administrative penalty on FanDuel would be larger than the assessment another operator received with a similar PGA violation.

Commissioner Skinner asked if there were any other operators who might have offered wagering on the PGA, or if it was just the two operators. Counsel Franks stated that the IEB was unaware of any other operators which offered wagering on the PGA prior to its approval by the Commission.

Commissioner O'Brien stated that she would like to see the length of time of the noncompliance, the level of money involved, and the specifics of an operator's past noncompliance used as mitigating or escalating factors when determining civil administrative penalties.

The Commission reached a consensus to accept the IEB's recommendation of a \$15,000 civil administrative penalty on FanDuel.

b. Briefing on noncompliance matter related to Temporary Category 3 Sports Wagering Licensee FBG Enterprises Opco, LLC, d/b/a Fanatics Betting and Gaming and discussion regarding next steps. Alleged noncompliance relates to offering wagering on an

unapproved event in violation of 205 CMR 247.01(1), 205 CMR 247.01(2)(i), and the Massachusetts Sports Wagering Catalog. (1:34:26)

Counsel Franks explained that there was an alleged noncompliance event involving FBG Enterprises Opco, LLC d/b/a Fanatics Betting and Gaming (“Fanatics”). She stated that Fanatics had offered wagering on the MPBL, an unapproved basketball league, between July 1, 2024 and April 25, 2025. She stated that there were 14,035 wagers with a total handle of \$712,957. *A memorandum regarding this alleged noncompliance event was included in the Commissioners’ Packet on page 66.*

The Commission reached a consensus to refer this matter to the IEB for investigation and a recommended civil administrative penalty.

c. Briefing on noncompliance matter related to Category 3 Sports Wagering Licensee American Wagering, Inc. d/b/a Caesars Sportsbook and discussion regarding next steps. Alleged noncompliance relates to offering wagering on unauthorized event in violation of 205 CMR 247.01(2)(i) (1:36:57)

Enforcement Counsel Nathaniel Kennedy stated that multiple operators had an alleged noncompliance event related to the college basketball Crown Tournament. He stated that American Wagering, Inc. d/b/a Caesars Sportsbook (“Caesars”) accepted 1,039 wagers between March 23, 2025 and March 31, 2025 in the amount of \$56,665. He stated that Caesars inquired with Commission staff as to whether wagering was permitted on this event, at which time it was discovered that the NCAA did not govern this tournament; therefore, the tournament was not approved. *A memorandum regarding this alleged noncompliance event was included in the Commissioners’ Packet on page 67.*

Commissioner Hill asked how a tournament featuring NCAA teams was not sponsored by the NCAA. Counsel Kennedy stated that while the tournament featured NCAA teams and was included on the NCAA schedule, the tournament was not subject to NCAA approval and was therefore violative of the sports wagering catalog. Commissioner Hill asked what distinguished this tournament from similar NCAA events such as the Maui Tournament. Counsel Kennedy stated that he did not have an answer to that question. He noted that the Sports Wagering Division did a brief investigation before determining the tournament was not a sanctioned event.

Commissioner Brodeur stated that he would send this matter back to the IEB while also having the Sports Wagering Division research what events are included in the events catalog. He stated that it was difficult to distinguish this tournament from normally sanctioned NCAA events.

Chair Maynard inquired as to who sanctioned the Crown Tournament. Counsel Kennedy stated that the event was governed by an independent body.

Commissioner Hill stated that he would refer the matter back to the IEB and suggested that the regulation regarding the event catalog be reviewed. Chair Maynard stated that the matter could be referred back to the IEB and considered by the Commission again when the IEB returns with

its recommendation. Commissioner Skinner stated that the concerns raised by Commissioner Hill could be considered as mitigating factors when the IEB returns with its recommendation.

The Commission reached a consensus to refer this matter to the IEB for investigation and a recommended civil administrative penalty.

d. Briefing on noncompliance matter related to Category 1 Sports Wagering Licensee Wynn MA, LLC d/b/a Encore Boston Harbor and discussion regarding next steps. Alleged noncompliance relates to offering wagering on unauthorized event in violation of 205 CMR 247.01(2)(i) (1:46:33)

Counsel Kennedy explained that EBH similarly offered wagers on the Crown Tournament. He stated that EBH accepted 77 wagers between March 30, 2025 and March 31, 2025 in the amount of \$5,199. He stated that EBH ceased offering wagers on this event and inquired with the Sports Wagering Division as to whether the event was authorized. He stated that the Sports Wagering Division informed EBH that this event was not authorized. *A memorandum regarding this alleged noncompliance event was included in the Commissioners' Packet on page 67.*

Chair Maynard commended the operators for self-reporting this alleged noncompliance event. The Commission reached a consensus to refer this matter to the IEB for investigation and a recommended civil administrative penalty. Chair Maynard suggested adding language to the events catalog that would permit wagering on these types of tournaments.

7. Community Affairs Division (1:48:35)

a. FY 2026 Community Mitigation Fund Grant Application Review I. Municipal Block Grant Applications - Boston

Chief of the Community Affairs Division Joe Delaney presented the Municipal Block Grant Application submitted by the City of Boston. He stated that the Community Affairs Division recommended full funding in the amount of \$2,607,000 and a waiver to allow the City of Boston to have three years to administer certain portions of the grant. *A summary of the City of Boston's Grant Application was included in the Commissioners' Packet on pages 68 through 72.*

Commissioner Brodeur moved that the Commission approve the City of Boston's application for funding from the Community Mitigation Fund in the amount of \$2,607,000 with the condition that funding for the Public Safety Program Coordinator and Overtime initiatives be expended based on a 3-year term, set to expire on June 30, 2028, in accordance with their waiver request, for the reasons set forth in the submitted application and materials included in the Commissioners' Packet and as discussed here today, and further, that Commission staff be authorized to execute all necessary grant instruments commemorating this award in accordance with 205 CMR 153.04. Commissioner Skinner seconded the motion.

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.
Commissioner Brodeur: Aye.
Chair Maynard: Aye.
The motion passed unanimously, 5-0.

8. Legal (1:58:54)

- a. 205 CMR 115.04: Phase 1 and New Qualifier Investigation and Recommendations by the Bureau – Discussion and Review of Regulation Amendment and Small Business Impact Statement for authorization to begin the promulgation process by Commission - 1205

Staff Attorney Autumn Birarelli presented proposed amendments to 205 CMR 115.04. *A memorandum, redline of the amended 205 CMR 115.04, and Small Business Impact Statement were included in the Commissioners' Packet on pages 73 through 79.*

Regarding the differences between adjudicatory hearings and public hearings and the Commission's ability to enter an executive vs. a closed session, Attorney Birarelli noted that the Commonwealth's recent budget bill amended G.L. c. 23N § 6(i) which expanded the reasons available to the Commission to enter an executive session for matters regarding a sports wagering licensees' trade secrets, competitively-sensitive information or other proprietary information. She stated that while this gave the Commission a new avenue to enter an executive session in a public hearing, the possibility of such would require proper notice. She stated that a novel issue arising during a qualifier suitability adjudicatory hearing that raised privacy or other sensitive issues could be reviewed in a closed session under 205 CMR 101 but may not be able to be reviewed in an executive session in a public hearing depending on the subject matter to be discussed. She stated that it was preferable for new qualifier suitability proceedings to be done by adjudicatory hearing.

Commissioner Skinner stated that she was supportive of the amendment. She stated that the first sentence of 205 CMR 115.04(2) was superfluous as going forward, based on the proposed amendment, all qualifier suitability proceedings would be held in adjudicatory hearings. Commissioner O'Brien expressed concern that removing the "if" in 205 CMR 115.04(2) would turn the sentence into a "shall". Chair Maynard stated that he agreed with Commissioner O'Brien's interpretation of the regulation.

Commissioner O'Brien stated that the Commission could move forward with the language as presented and request that the Legal Division review the language to see if the first sentence of 205 CMR 115.04(2) could be deleted without creating a requirement for the Commission. She noted that executive sessions also only allowed the Commission to protect the privacy interests of the applicant but not a third-party involved with the applicant.

Commissioner O'Brien moved that the Commission approve the Small Business Impact Statement and the draft of 205 CMR 115.04 as included in the Commissioners' Packet and discussed here today, and further, that staff be authorized to take the steps necessary to file the

required documentation with the Secretary of the Commonwealth to begin the regulation promulgation process. Commissioner Skinner seconded the motion.

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Brodeur: Aye.

Chair Maynard: Aye.

The motion passed unanimously, 5-0.

b. Litigation Update (2:13:58)

Chair Maynard stated that the Commission would discuss Commissioner updates and other business before taking a vote to enter executive session. He further noted that the Commission would not be returning to the public meeting following the executive session.

Transcriber's note: The Commission discussed agenda item nos. 10 and 11 before resuming agenda item nos. 8(b) and 9. Upon resuming said agenda items, the Commission read the executive session language to discuss both agenda item before entering the executive session.

Chair Maynard stated that the Commission anticipated that it would convene in an Executive Session pursuant to G.L. c. 30A, § 21(a)(3) in conjunction with its review of litigation strategy with respect to Public Health Advocacy Institute v. Massachusetts Gaming Commission, as discussion at an open meeting may have a detrimental effect on the litigation position of the Commission.

Commissioner Brodeur moved that the Commission enter executive session on the matter and for the reasons just articulated by the Chair. Commissioner Skinner seconded the motion

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Brodeur: Aye.

Chair Maynard: Aye.

The motion passed unanimously, 5-0.

9. Meeting Minutes (2:14:56)

a. Executive Session

Chair Maynard stated that the Commission anticipated that it would meet in an executive session to review minutes from previous executive sessions as their discussion at an open meeting may frustrate the intended purpose for which the executive session was convened, pursuant to G.L. c. 30A, § 21(a)(7) and c. 23N, § 6(i): December 6, 2022; G.L. c. 30A, § 21(a)(7); c. 23N, § 6(i);

and c. 4, § 7(26)(c) and (n): December 13, 2022 at 12:56PM and 3:15PM; G.L. c. 30A, § 21(a)(7) and c. 4, § 7(26)(n): May 22, 2025 at 1:34PM; and G.L. c. 30A, § 21(a)(3), (4), (6) and (7); c. 4, § 7(26)(f) and (n); c. 23K, § 21(a)(7); and c. 23N, § 6(i): May 22, 2025 at 1:50 PM.

Commissioner Skinner moved that the Commission enter executive session for the reasons just stated by the Chair. Commissioner Hill seconded the motion

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Brodeur: Aye.

Chair Maynard: Aye.

The motion passed unanimously, 5-0.

10. [Commissioner Updates](#) (2:10:16)

Commissioner Brodeur stated that the recently passed federal tax and spending bill included a change in tax treatment for gambling proceeds. He stated that the bill restricted the amount of losses that are deductible under federal taxes. He stated that this could disincentivize patrons from participating in the legal gaming market. He stated that this was a topic to keep an eye on and discuss with other regulators in order to protect consumers.

11. [Other Business](#) (2:13:45)

Upon inquiry by the Chair, no other business was noted.

Transcriber's note: The Commission entered executive session at 12:22 PM and did not reconvene the public meeting session.

List of Documents and Other Items Used

1. [Revised Notice of Meeting and Agenda](#) dated July 11, 2025
2. [Commissioner's Packet from the July 15, 2025 meeting](#) (posted on massgaming.com)



TO: Chair Maynard, Commissioners O'Brien, Hill, Skinner, and Brodeur

FROM: Mark Vander Linden, Director of Research and Responsible Gaming,
Bonnie Andrews, Senior Research Manager

CC: Dean Serpa, Executive Director

DATE: July 31, 2025

RE: Current Trends in Gambling, Sports Betting and Problem Gambling in Massachusetts, 2022-2024 and
Sports Betting in Massachusetts: 2023 Economic Impacts Report

Section 71 of chapter 23K of the Massachusetts General Laws directs the Massachusetts Gaming Commission (MGC) to develop an annual research agenda to understand the social and economic effects of expanded gaming in the Commonwealth. Section 23 of chapter 23N of the Massachusetts General Laws expands this research agenda to encompass understanding the social and economic effects of sports wagering. The University of Massachusetts Amherst (UMass) School of Public Health and Health Sciences has been evaluating these impacts as part of the Social and Economic Impacts of Gambling in Massachusetts (SEIGMA) study funded by the MGC.

Today the SEIGMA team will be presenting two reports. The first report, *Current Trends in Gambling, Sports Betting and Problem Gambling in Massachusetts, 2022-2024*, assesses changes in gambling attitudes, gambling participation, and problem gambling prevalence among monthly gamblers in the four most recent online panel surveys in Massachusetts, carried out between 2022 and 2024. The purpose of the second report, *Sports Betting in Massachusetts: 2023 Economic Impacts Report*, is to catalog as accurately as possible the ways in which the Massachusetts economy has been changed by the legalization of sports betting.

Attached are the final reports, research snapshots, and the presentations.



Massachusetts Gaming Commission

101 Federal Street, 12th Floor, Boston, Massachusetts 02110 | TEL 617.979.8400 | FAX 617.725.0258 | www.massgaming.com

MGC Research Snapshot

Sports Betting in Massachusetts: 2023 Economic Impacts Report

June 2025

What you need to know

This early research on sports wagering shows that, in every respect, the positive impacts to the Commonwealth generated by this new industry are dwarfed by the positive impacts generated by other forms of gambling in the state. Casino gambling remains by far the larger driver of economic activity in Massachusetts. While the amount of money wagered, won, and lost in sports betting is significant, the legalization of sports betting has not led to significant new levels of employment in the Commonwealth, and mobile operators spent about 4% of payments overall on Massachusetts businesses in contrast to 45.8% of payments by casinos. Sports betting's positive impact on the economy is largely due to the revenue it generates for the Commonwealth and the subsequent expenditure of those funds.

What is this research about?

The purpose of this report, prepared by the University of Massachusetts Donahue Institute (UMDI) as part of the Social and Economic Impacts of Gambling in Massachusetts (SEIGMA) project, is to catalog as accurately as possible the ways in which the Massachusetts economy has been changed by the legalization of sports betting. Legalization introduced three retail sports betting operators, operating within the three existing casino locations, and nine mobile or online sports betting operators (six of which operated through 2023) into the Commonwealth's gambling industry.

What did the research do?

To estimate economic impacts, three key sources of data have been collected: casino and mobile sports betting operations (spending on vendors, employees and government entities), gross gaming revenues, and patron spending behavior. Taken together, these measures of economic activity can be quantified and used as inputs to inform the SEIGMA team's REMI PI+ economic model. The output from this model allows for capturing the "ripple effects" that are caused by these direct impacts and therefore make conclusions about the total impacts of these changes on the Massachusetts economy.

Important to note is that though the economic impacts of the casino industry have been modeled thoroughly in the past, the sports betting industry, and specifically mobile sports betting, is quite different from the casino industry in almost every way, except that they both involve gambling. The economic activities these operators engage in, and the degree to which they engage in these activities in Massachusetts, differs from casino operators. As such, new methods were developed, and the data used to understand these impacts are different.

What did the researchers find?

Key findings include:

Employment:

- As a technology-based activity, mobile sports betting does not require nearly the same levels of hiring to operate that the casinos required when they opened. It is also less important that those jobs be physically located in Massachusetts.
- In 2023, mobile sports betting operators employed an average of 10,265 employees across the U.S. industry in a quarter.
- Nearly twelve percent of those employees, an average of 1,185 in a quarter, were employed in Massachusetts. However, most of that employment either existed in Massachusetts prior to the legalization of sports betting or was remote work that was not necessarily tied to the expansion of gambling in Massachusetts.

Vendor Spending:

- In terms of business-to-business spending, Category 3 operators made a total of \$1.74 billion in payments to vendors across the state and nation in 2023.
- About four percent of those payments, \$70.8 million, were made to Massachusetts firms.
- As a result of initiating operations in Massachusetts, sports betting operators reported spending needs in several key sectors. Major spending areas related to setting up and maintaining data centers in a new location, new spending on marketing, advertising, and promotions, and new spending on professional technical services related to legal and regulatory requirements.



Revenues

- The mobile sports betting industry grossed a total of \$465.1 million in 2023. Of that total, individual operators earned between \$4.6 million and \$237.4 million.
- We estimate that 29 percent of spending on mobile sports betting, or just under \$137 million, was recaptured from out-of-state or “gray market” betting.
- Taxes on gross gaming revenue in this sector generated a total of \$90.8 million for the Commonwealth in 2023. When considered with casino gross gaming revenue taxes, sports betting taxes represented 22 percent of all non-lottery gaming tax revenue that year.
- Gross gaming revenue has increased 155 percent over the past decade while gaming tax revenues only increased 72 percent, due in part to the lower tax rates on each new form of gambling introduced.
- Casino revenue declined by 0.9 percent in FY2024, the first year on year decline since Plainridge Park Casino opened in 2015. It is possible that the declines between FY2023 and FY2024 were only minor fluctuations in what will prove to be relatively stable year-to-year revenue. However, the immediate leveling off of casino revenue once sports betting was introduced is striking.

Patrons: Consumer Spending

- In 2023, bettors placed \$4.7 billion worth of online sports bets in Massachusetts and approximately \$4.25 billion was paid out in prizes to gamblers, resulting in over \$450 million in revenue.
- An estimated \$136.9 million dollars or 29 percent of mobile sports betting revenue came from patrons who reported that they would have spent their money on some other type of sports betting if mobile sports betting had not been legalized in Massachusetts.
- An estimated \$333.7 million dollars (71 percent of revenue) were reallocated away from other types of economic activities and towards mobile sports betting. In other words, we estimate that these funds would have been spent elsewhere in the economy if not for legalized sports betting, a trend that we refer to as consumption reallocation.

Total Impacts

- All casino and sports betting impacts considered, the legalization of gambling in Massachusetts created and supported an estimated net of 15,459 jobs across the Commonwealth. Of these jobs, almost all of them are the result of the casino industry, and almost half are the result of Encore Boston Harbor alone.

About the researchers

Thomas Peake, Rebecca Loveland, Kazmiera Breest, and Rye McKenzie are with the Economic and Public Policy Research group at the Donahue Institute at the University of Massachusetts Amherst. For more information about this report, please contact Thomas Peake at tpeake@donahue.umass.edu.

- The mobile sports betting industry, taken as a whole, creates or supports approximately 118 jobs. This number represents the estimated number of jobs created through the operations of sports betting firms (722) and the number of jobs created through new state government spending of sports betting revenue (1,861) minus estimated jobs lost through consumption reallocation (2,465).
- Legalized gambling also supports almost \$3.6 billion in Output (sales), with \$2.5 billion of that being Value Added (gross state product). Only 2.0 percent of Output from legalized gambling is generated by mobile sports betting. Mobile sports betting’s relatively small share is likely a result of its limited in-state vendor spending and limited direct employment.
- Sports betting’s positive impact on the economy is largely due to the tax revenue it generates for the Commonwealth, and the subsequent expenditure of those funds.

Conclusion

The results of this economic modeling exercise indicate that the net economic impact of sports betting is slightly positive, but it is important to note that these results do not account for social impacts that may have “downstream” economic impact, such as bankruptcies and should be viewed with some degree of caution.

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Research Related to Sports Wagering, Economic Impacts

About this Snapshot

MGC Snapshots are intended to translate lengthy and sometimes technical reports into an easily understandable overview of the research. The findings and recommendations in the Snapshot are those of the researchers and do not necessarily reflect the position of the MGC.

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UNIVERSITY OF MASSACHUSETTS SCHOOL OF PUBLIC HEALTH AND HEALTH SCIENCES

Sports Betting in Massachusetts: 2023 Economic Impacts Report

Prepared by the UMass Donahue Institute's
Economic & Public Policy Research Group

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Executive Summary

Through the establishment of the gambling industry in Massachusetts, lawmakers provided avenues for the creation of new jobs, revenue, and economic growth in the state. The Social and Economic Impacts of Gambling in Massachusetts (SEIGMA) project, of which the Economic and Public Policy Research (EPPR) unit at the University of Massachusetts Donahue Institute (UMDI) is a part, strives to understand the impact of the casinos on the people and economy of the Commonwealth.

The purpose of this report is to catalog as accurately as possible the ways in which the Massachusetts economy has been changed by the legalization of sports betting. Legalization introduced three retail sports betting operators, operating within the three existing casino locations, and nine mobile or online sports betting operators¹ into the Commonwealth's gambling industry. Understanding how the introduction of these operators affects the economy involves analyzing the impacts of multiple parts of these operations, namely, operating impacts such as employment and spending to other businesses, gross gaming revenues, and consumer spending patterns. Taken together, these measures of economic activity can be quantified and used as inputs to inform the SEIGMA team's REMI PI+ economic model. The output from this model allows us to capture the "ripple effects" that are caused by these direct impacts and therefore make conclusions about the total impacts of these changes on the Massachusetts economy.

To estimate economic impacts, three key sources of data have been collected: casino and mobile sports betting operations (spending on vendors, employees and government entities), gross gaming revenues, and patron spending behavior. Given that this report is intended for the Massachusetts Gaming Commission and a broader audience of policymakers and stakeholders in Massachusetts, we have constrained our analysis to economic activity that a) occurs in the gambling space (casinos and sports betting) and b) would not have occurred in Massachusetts if the Commonwealth had not legalized gambling. For similar reasons, economic activity related to mobile sports betting is excluded from our analysis in cases where the SEIGMA team determined that activity to be a continuation of activity that pre-dated the legalization of mobile sports betting in Massachusetts, and that likely would have continued regardless of whether or not Massachusetts legalized sports betting. Though the economic impacts of the casino industry have been modeled thoroughly in the past, the sports betting industry, and mobile sports betting in particular, is quite different from the casino industry in almost every way, except that they both involve gambling. The economic activities these operators engage in, and the degree to which they engage in these activities in Massachusetts, differs from casino operators. As such, new methods were developed, and the data used to understand these impacts are different. The estimated impacts are highlighted below.

Direct Impacts

Employment

- As a technology-based activity, mobile sports betting does not require nearly the same levels of hiring to operate that the casinos required when they opened. It is also less important that those jobs be physically located in Massachusetts.
- In 2023, mobile sports betting operators employed an average of 10,265 employees across the U.S. industry in a quarter.

¹ At the time of writing, nine sports betting operators had been licensed by the MGC, although some ultimately withdrew from the state. Our analysis will cover the impact of the six that operated through 2023.

- Nearly twelve percent of those employees, an average of 1,185 in a quarter, were employed in Massachusetts. However, most of that employment either existed in Massachusetts prior to the legalization of sports betting or was remote work that was not necessarily tied to the expansion of gambling in Massachusetts.

Vendor Spending

- In terms of business-to-business spending, Category 3 operators made a total of \$1.74 billion in payments to vendors across the state and nation in 2023.
- About four percent of those payments, \$70.8 million, were made to Massachusetts firms.
- As a result of initiating operations in Massachusetts, sports betting operators reported spending needs in several key sectors. Major spending areas related to setting up and maintaining data centers in a new location, new spending on marketing, advertising, and promotions, and new spending on professional technical services related to legal and regulatory requirements.

Revenues

- The mobile sports betting industry grossed a total of \$465.1 million in 2023. Of that total, individual operators earned between \$4.6 million and \$237.4 million.
- We estimate that 29 percent of spending on mobile sports betting, or just under \$137 million, was recaptured from out-of-state or “gray market” betting.
- Taxes on gross gaming revenue in this sector generated a total of \$90.8 million for the Commonwealth in 2023. When considered with casino gross gaming revenue taxes, sports betting taxes represented 22 percent of all non-lottery gaming tax revenue that year.
- Gross gaming revenue has increased 155 percent over the past decade while gaming tax revenues only increased 72 percent, due in part to the lower tax rates on each new form of gambling introduced.
- Casino revenue declined by 0.9 percent in FY2024, the first year on year decline since Plainridge Park Casino opened in 2015. It is possible that the declines between FY2023 and FY2024 were only minor fluctuations in what will prove to be relatively stable year-to-year revenue. However, the immediate leveling off of casino revenue once sports betting was introduced is striking.

Patrons: Consumer Spending

- In 2023, bettors placed \$4.7 billion worth of online sports bets in Massachusetts and approximately \$4.25 billion was paid out in prizes to gamblers.
- An estimated \$136.9 million dollars or 29 percent of spending on mobile sports betting came from patrons who reported that they would have spent their money on some other type of sports betting if mobile sports betting had not been legalized in Massachusetts.
- An estimated \$333.7 million dollars (71 percent of spending) were reallocated away from other types of economic activities and towards mobile sports betting. In other words, we estimate that these funds would have been spent elsewhere in the economy if not for legalized sports betting, a trend that we refer to as consumption reallocation.

Total Impacts

- All casino and sports betting impacts considered, the legalization of gambling in Massachusetts created and supported an estimated net of 15,459 jobs across the Commonwealth. Of these jobs, almost all of them are the result of the casino industry, and almost half are the result of Encore Boston Harbor alone.
- The mobile sports betting industry, taken as a whole, creates or supports approximately 118 jobs. This number represents the estimated number of jobs created through the operations of sports betting firms (722) and the number of jobs created through new state government spending of sports betting revenue (1,861) minus estimated jobs lost through consumption reallocation (2,465).
- Legalized gambling also supports almost \$3.6 billion in Output (sales), with \$2.5 billion of that being Value Added (gross state product). Only 2.0 percent of Output from legalized gambling is generated by mobile sports betting. Mobile sports betting's relatively small share is likely a result of its limited in-state vendor spending and limited direct employment.
- Sports betting's positive impact on the economy is largely due to the tax revenue it generates for the Commonwealth, and the subsequent expenditure of those funds.
- The results of our economic modeling exercise indicate that the net economic impact of sports betting is slightly positive, but it is important to note that these results do not account for social impacts that may have "downstream" economic impact, such as bankruptcies and should be viewed with some degree of caution.

Introduction

Overview

The goal of this report is to catalog as accurately as possible the ways in which the Massachusetts economy has been changed by the legalization of sports betting. Legalization introduced three retail sports betting operators, operating within the three existing casino locations, and nine mobile or online sports betting operators² into the commonwealth's gambling industry. Understanding how the introduction of these operators affects the economy involves analyzing the impacts of multiple parts of these operations. First, we measure operating impacts, which include employment and spending to other businesses, to understand the impacts of the jobs created, wages paid, and goods and services purchased by these operators. The gross gaming revenue (GGR) collected by the Commonwealth and spent as new state government spending is another important piece of the economic picture. Finally, changes in the spending patterns of sports betting patrons further influence the nature of the industry's impact on the economy. Taken together, these measures of economic activity can be quantified and used as inputs to inform the SEIGMA team's REMI PI+ economic model. The output from this model allows us to capture the "ripple effects" that are caused by these direct impacts and therefore make conclusions about the total impacts of these changes on the Massachusetts economy.³

Because this report is intended for the Massachusetts Gaming Commission and a broader audience of policymakers and stakeholders in Massachusetts, we have constrained our economic impact modeling exercise to economic activity that a) occurs in the gambling space (casinos and sports betting) and b) would not have occurred in Massachusetts if the Commonwealth had not legalized gambling. So, in the case of a business in Massachusetts that was supplying goods or services to an out-of-state casino, that would not be included in our analysis, and in fact we would not receive any data on that activity. For similar reasons, economic activity related to mobile sports betting is excluded from our analysis in cases where the SEIGMA team determined that activity to be a continuation of activity that pre-dated the legalization of mobile sports betting in Massachusetts, and that likely would have continued regardless of whether Massachusetts legalized sports betting.

As a part of the Massachusetts Gaming Commission's research agenda, the SEIGMA team produced an initial study on the Massachusetts sports betting industry, in which the team formed important assumptions regarding the ways in which the industry ought to be modeled. Though the economic impacts of the casino industry have been modeled thoroughly in the past, the sports betting industry, and mobile sports betting in particular, is quite different from the casino industry in almost every way, except that they both involve gambling. The economic activities these operators engage in, and the degree to which they engage in these activities in Massachusetts, differs from casino operators. As such, the methods and data used to understand these impacts are different, and in some cases not as robust as those used for studying casino impacts.

Early Impacts and Assumptions

As discussed in our previous report, *Early Economic Impacts of Sports Betting in the Commonwealth of Massachusetts*, an analysis of the available data allowed the research team to make early determinations regarding how best to model the economic impacts of sports betting. This section,

² At the time of writing, nine sports betting operators had been licensed by the MGC, although some ultimately withdrew from the state. Our analysis will cover the impact of the six that operated through 2023.

³ For more information on methodology and the use of REMI model see Appendix 2: Methodology, located on page 30.

featured in the previous report, briefly describes our findings and recommendations for studying the industry going forward.

Retail Sports Betting

Early findings indicated that retail sports betting operations are a relatively small share of casino operations. While 3.3 percent of employees at Plainridge Park Casino work in the sports betting operation, sports betting employees represent an even smaller portion, less than one percent of employees, at the other two casinos. Likewise, sports betting constitutes less than three percent of vendor spending, and less than two percent of in-state vendor spending, at all three casinos.

While retail sports betting represents a small share of total casino employment and spending, its operations are heavily integrated into the broader operations of the casino. In the case of Encore Boston Harbor, casino employees split their time between sports betting and other operations. Even in casinos that have dedicated sports betting employees, there is reason to believe retail sports betting may have generated demand for labor or business-to-business spending which is impossible to capture accurately. For example, some share of a bartender or hotel worker's labor is in service of patrons who visited the casino to place sports bets, but the share is unknown. Similar problems present themselves with vendor spending. For example, casinos use the same vendors to order uniforms for sports betting employees that they do for other casino employees.

For these reasons, we determined that future economic impact studies will consider retail sports betting as a part of the casinos' broader operations. Findings from operator data and qualitative questionnaires suggest that the economic impact of retail sports betting is not large or distinct enough to warrant additional economic impact work beyond what the SEIGMA team already does to monitor the impact of the casinos. Moreover, while the exact nature of their arrangements vary across casinos, retail sports betting operations are integrated into the operations of the casinos to the point that it is impossible to accurately isolate the impacts of retail sports betting from those of the host casino. Therefore, the best way to capture on-site sports betting impacts is to treat it as another aspect of the casinos. The SEIGMA team did collect data on total casino operations as part of our ongoing data request program. For an analysis and summary of casino and retail sports betting impacts in 2023, see Appendix 1.

Mobile Sports Betting

While mobile sports betting operators are regulated by the MGC, they are authorized through a separate legislative act and subject to different restrictions and requirements than those set for casinos. One consequence is that the SEIGMA team has not been able to access the same level of data from mobile sports betting operators as it does from casino operators. Our work on the Early Economic Impacts of Sports Betting in the Commonwealth of Massachusetts study enabled us to form recommendations for modeling the economic impact of the mobile sports betting industry given these restrictions.

First, employment impacts from mobile sports betting tend to be small. Where sports betting employment was significant, the SEIGMA team determined that it was related to pre-existing operators in Massachusetts, rather than new employment following the expansion of sports betting in Massachusetts. Therefore, it would not be appropriate to attribute the employment of its existing in-state workers to the legalization of sports betting in Massachusetts.

Assumptions about the nature of the sports betting industry were also developed using a questionnaire that was distributed to mobile and retail operators in the summer of 2024. In this questionnaire, operators answered multiple choice and open response questions regarding operational structures and changes resulting from the expansion of sports betting into Massachusetts. Depending on the

respondent, questions focused on either the integration of retail sports books into casino locations for Category 1 operators or on the expansion of digital enterprises into a new state for Category 3 operators. The questions asked in the survey were related to employment and hiring, new spending in and outside of Massachusetts, and diversity policies and programs. These responses revealed that while there is some new hiring and spending related to sports betting expansion, it is very limited.

While the primary economic impacts of the casinos have been operational impacts, the SEIGMA team believes that the most important economic impacts of mobile sports betting will be the impact of new state revenue and the impact of consumer reallocation towards sports betting and away from other goods and services. These impacts were measured for casino impact studies in the past, but they will take on greater significance in sports betting studies, given the lack of major operating impacts. Fortunately, there is data available to the SEIGMA team on these topics that can be used to inform economic impact models. The MGC collects rich data on operator gross gaming revenues. In lieu of on-site patron surveys that provided information on patron behavior in prior casino reports, two data sources are available to gain insight into consumer behavior: location data from AirSage, and survey data (for retail sports betting and ongoing casino work) from SEIGMA's 2024 Online Panel Survey (OPS24). Details on both data sources are available in the appendices to this report. AirSage data allows us to determine the point of origin (used as a proxy for home address) of individuals who visited the casinos but does not provide any further information beyond this. OPS24 offers a rich data set with an extensive range of questions, but only surveys Massachusetts residents. This does leave some gaps in knowledge about the behavior of out-of-state patrons. On the other hand, this approach allows us to collect a significantly larger database at a reduced cost.

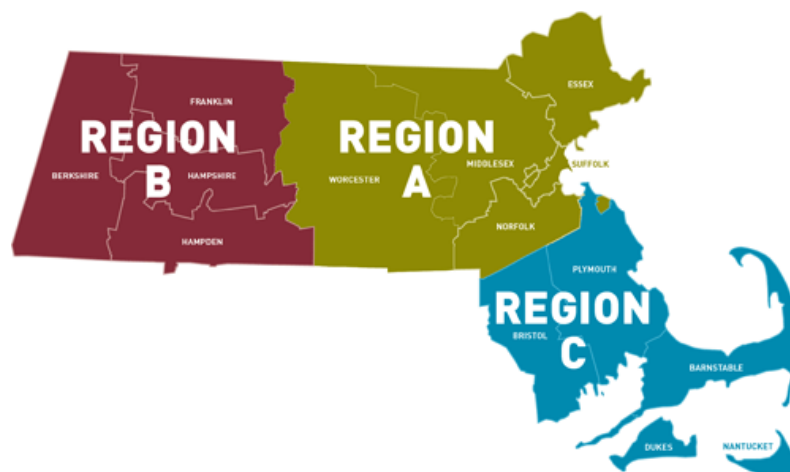
In accordance with assumptions made about retail and online sports betting, the remainder of this report will focus solely on online sports betting.

Background to the Research Project

In November of 2011, Governor Deval Patrick signed the Expanded Gaming Act into law, an act tasked with establishing the grounds for gambling legalization in the Commonwealth. Through the expansion of the casino industry in Massachusetts, lawmakers provided avenues for the creation of new jobs, revenue, and economic growth in the state. To ensure these needs are met, the Massachusetts Gaming Commission (MGC)—established to oversee the implementation of the Expanded Gaming Act—organizes protective measures for communities threatened by potential social and economic impacts of gaming establishments. The UMass Donahue Institute (UMDI), as a part of the Social and Economic Impacts of Gambling in Massachusetts (SEIGMA) Research Team, is tasked with producing various analyses of economic and fiscal impacts in fulfillment of the MGC's research agenda and mandates.

The gaming legislation allows for the creation of up to three commercial resort-style casinos in the state and one slots parlor. To reduce internal competition among casinos, the Commonwealth was divided into three licensing regions, shown in Figure 1, with each region able to attract no more than one full resort-style casino license. Slots-parlor licenses are not geographically limited. To date, two full resort-style licenses and one slots-parlor license have been awarded. In Region A, Plainridge Park Casino—the state's singular slots-parlor—launched the casino industry with its opening in Plainville, Massachusetts in July of 2015. MGM Springfield located in Springfield, Massachusetts, started as the first resort-style casino in the state, having taken residence in Region B in August of 2018. Encore Boston Harbor opened in Everett, Massachusetts, in June of 2019, joining Plainridge Park Casino as the second casino in Region A and joining MGM Springfield as the second resort-style casino in the Commonwealth.

Figure 1: Massachusetts Gaming Commission Regions



Source: Massachusetts Gaming Commission

Building on the 2011 Massachusetts Expanded Gaming Act, G.L c.23K, the Commonwealth legalized sports wagering activities in 2022 through an Act to Regulate Sports Wagering (House Bill No. 5164). The MGC was tasked with overseeing the promulgation of the sports wagering industry in the state. The resulting law, Massachusetts General Laws c.23N, created license categories for three distinct types of sports wagering operators based on modes of play: in-person gambling at casinos; in-person wagering at establishments that either conduct live horse racing or simulcast wagering on horse or greyhound racing; and online or mobile wagering.

More than 30 companies seeking to be prospective operators submitted requested documents and other pertinent materials to the MGC during the application process. The three licensed casinos in Massachusetts, Encore Boston Harbor, MGM Springfield, and Plainridge Park Casino were granted Category 1 licenses to offer in-person sports wagering. Category 1 licenses became effective at the end of January 2023. Nine operators were granted Category 3 licenses to offer mobile or online sports wagering. With licenses that rolled out starting in March 2023, the list now includes the following digital operators:

- BetMGM
- Caesars Sportsbook
- Fanatics Betting & Gaming
- Penn Sports Interactive
- Bally Bet
- DraftKings
- FanDuel
- Betr
- WynnBet

Bally Bet was not included in the analysis for this study because the company opened its Massachusetts sportsbook on July 1, 2024, too late to provide a data set for 2023. Betr and WynnBet did not renew their licenses in 2024 and no longer operate mobile sports wagering platforms in Massachusetts. As of 2024, no Category 2 (in person simulcast betting on horse and greyhound racing) licenses have been awarded.

Direct Impacts

Direct impacts are the economic impacts that stem directly from the operation of a firm, in this case the casino or mobile sports betting company. These impacts include employment, compensation paid to employees, and business-to-business spending. Direct impacts do not include any shifts in government spending as a result of new revenues, nor do they include changes in consumer spending that might result from the legalization of gambling in Massachusetts. This section focuses on the direct impacts of mobile sports betting in Massachusetts. Given the quarterly nature of the data collected from sports betting operators, operating impacts in this section are reported as aggregate quarterly averages for employment.

Employment and Wages

In 2023, mobile sports betting operators employed an average of 10,265 employees across the industry in a quarter. Nearly twelve percent of those employees, an average of 1,185 in a quarter, were employed in Massachusetts. It should be noted that a substantial majority of sports betting employment in Massachusetts can be attributed to pre-existing sports betting jobs in Massachusetts, whether at a Massachusetts-based sports betting firm, or in a remote position with an out-of-state firm. In either case, we consider these jobs unrelated to the expansion of sports betting into Massachusetts.

In questionnaire responses, five out of the six operators indicated that they generally hire new employees when expanding to a new state, with four out of six explicitly responding that they had hired new staff because of Massachusetts opting to legalize sports betting. Responses indicate that these positions tend to be customer-facing, specifically customer support and VIP services for high value patrons. However, as a technology-based activity, mobile sports betting does not require nearly the same levels of hiring to operate that the casinos required when they opened. It is also less important that those jobs be physically located in Massachusetts.

Most respondents stated that they operate with a centralized model and do not have employees dedicated to a specific state, indicating that employees supporting operations in Massachusetts do not necessarily need to be located in Massachusetts. Some of these employees work at the main office of the operator, while others work remotely. Some respondents indicated that they do have employees dedicated to a state during the first year or two, before adding the state to an employee or department's broader portfolio once their services have been successfully launched. VIP/Key Account Managers are most likely to be hired to manage specific states, since they are expected to meet face to face with high value patrons. Based on the survey responses, we estimate that less than 100 new individuals were hired, especially because only one type of job (VIP Support/Key Account Manager) required employees to live in Massachusetts.

Vendor Spending

Mobile sports betting operators made a total of \$1.74 billion in payments to vendors across the state and nation in 2023. About four percent of those payments, \$70.8 million, were made to Massachusetts firms. It is important to note that these calculations include expenditure for DraftKings, an organization which existed in the Commonwealth prior to legalization. For the purposes of economic modeling, we only modeled DraftKings' advertising spending, working on the assumption that the remainder of their Massachusetts vendor spending is not related to the expansion of sports betting into Massachusetts.

Table 1: Mobile Sports Betting Operating Impacts, 2023

Measure	All US	Massachusetts
Employment (Average Quarterly)	10,265	1,185
Vendor Spending (Total)	\$1,741,096,649	\$70,815,284

Source: Mobile sports betting operator data

The questionnaire sent to operators inquired about new business-to-business spending habits in addition to employment details. Upon initializing operations in a new state, mobile sports betting operators unanimously incur additional spending needs. Primarily, operators reported spending needs related to setting up and maintaining data centers in a new location, including hardware costs and tech labor costs. Five out of six operators also reported new spending on marketing, advertising, and promotions, while four out of six operators reported new spending related to legal and regulatory requirements. Other new spending needs such as retail staffing, customer service, and increased spending with existing vendors due to scaling were also reported.

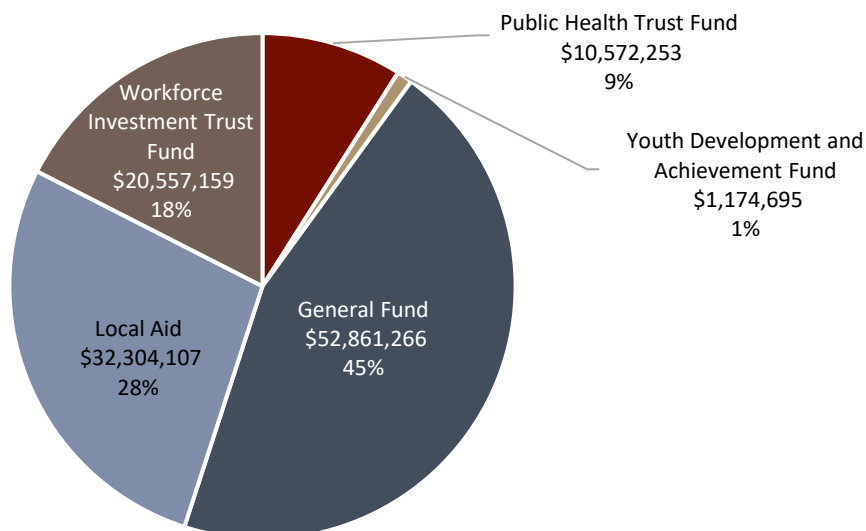
Looking more specifically at the legalization of sports betting in Massachusetts, mobile sports betting operators reported new spending on goods and services in the major categories discussed above as a result of expanding operators into the Commonwealth. Four out of six operators reported new spending on goods and services from in-state vendors, which typically consist of legal and lobbyist firms, data center and server hosting services, and local marketing and advertising vendors. Operators also reported contracting with in-state vendors related to operations staff, retail, and consulting needs. A subset of these services are provided by firms who perform work that requires them to be located in Massachusetts, such as data centers and servers, while operators reported preference for local legal consultants and advertisers in order to gain a local perspective.

Public Sector Impacts from Gross Gaming Revenue

One of the major motivations for legalizing sports betting is the large amount of new tax revenue that can be collected on sports bets. The revenue generated from taxes on gross gaming revenue (GGR), is an important piece of the economic picture that drives impacts on the public sector. While this section focuses on mobile sports betting, it is important to understand the impacts of the introduction of sports betting within the context of the existing trends of GGR generated by casinos and the lottery as well.

The funding generated by sports wagering revenue taxes already provides significant support to Massachusetts municipalities and organizations through dedicated allocations to five different state funds. In FY 2024 alone, \$117.6 million was collected and distributed to these funds. The largest portion of sports wagering tax revenue is designated for the General Fund, to which 45 percent is allotted. The next biggest recipient is Local Aid to municipalities, into which 28 percent is allotted, then the Workforce Investment Trust Fund at 18 percent, an additional nine percent is allocated to the Public Health Trust Fund (PHTF), and one percent is allocated to the Youth Development and Achievement Fund, a financial assistance program that aims to support Massachusetts students in higher education at approved institutions. The Public Health Trust Fund was established to specifically allocate resources to research, prevention, intervention, treatment, and recovery support services in order to mitigate the harmful effects of problem gambling and related issues.

Figure 2: Sports Betting Tax Revenue, FY24



Source: Massachusetts Gaming Commission

Mobile sports betting revenue did not accrue evenly across operators. The mobile sports betting industry grossed a total of \$465.1 million in Massachusetts in 2023. Of that total, individual operators earned between \$4.6 million and \$237.4 million. Draft Kings earned the highest gross revenue for the year (\$237.4 million), followed by FanDuel (\$149.9 million), and then BetMGM (\$40.5 million). We estimate that 29 percent of spending on mobile sports betting, or just under \$137 million, was recaptured from out-of-state or “gray market” betting. Taxes on gross gaming revenue in this sector are 20%, which generated a total of \$90.8 million for the Commonwealth in 2023. When considered with casino gross gaming revenue taxes in 2023, sports betting taxes represented 22 percent of all gaming tax revenues that year.

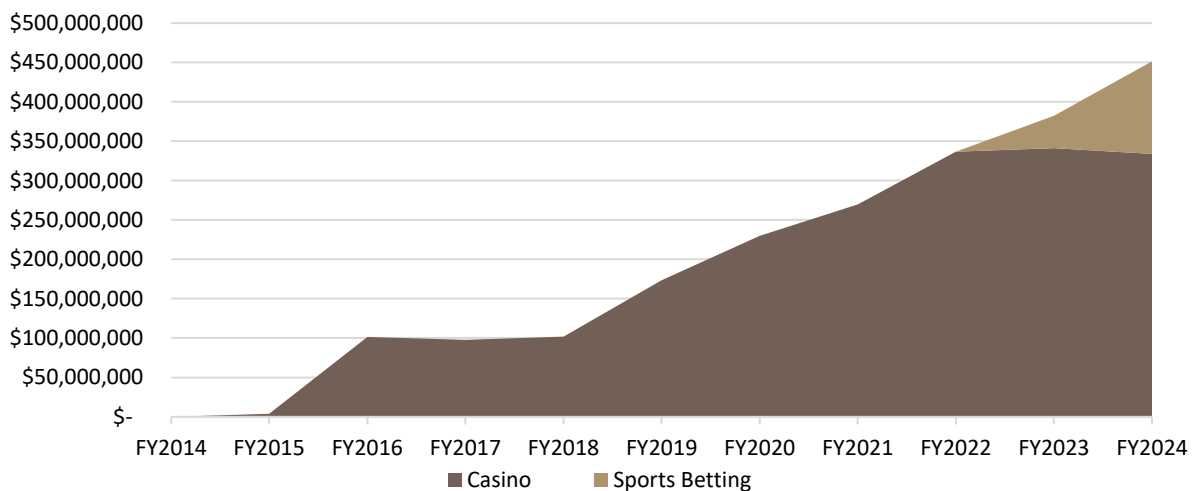
Table 2: Mobile Sports Betting Annual Win and State Revenue, 2023

Operator	Total Win/ Spending	State Revenue
BetMGM	\$40,534,460	\$7,937,639
Caesars	\$11,436,040	\$2,196,662
DraftKings	\$237,448,574	\$46,310,206
ESPN Bet	\$21,207,616	\$4,124,707
FanDuel	\$149,894,115	\$29,330,663
Fanatics	\$4,591,169	\$890,691
Total	\$465,111,974	\$90,790,568

Source: Massachusetts Gaming Commission

Note: Total Win/Spending represents monthly win prior to federal excise taxes. In other words, it is the net amount spent by gamblers in Massachusetts.

The introduction of sports betting has continued the general growth of overall gambling revenue in Massachusetts, although it appears to have somewhat eaten into casino revenue. Casino revenue declined by 0.9 percent in FY2024, the first year on year decline since Plainridge Park Casino opened in 2015. This decline may be unrelated to the introduction of sports betting, as FY2022 was the first full year of all three casinos operating with no pandemic-related restrictions, and there was only a small increase in revenue from FY2022 to FY2023, indicating that casinos may have reached their natural revenue peak even before sports betting was introduced. It is also possible that the declines between FY2023 and FY2024 were only minor fluctuations in what will prove to be relatively stable year-to-year revenue. However, the immediate leveling off of casino revenue once sports betting was introduced is striking.

Figure 3: Gaming Tax Revenue, FY2014 – FY2024 (2023 dollars)

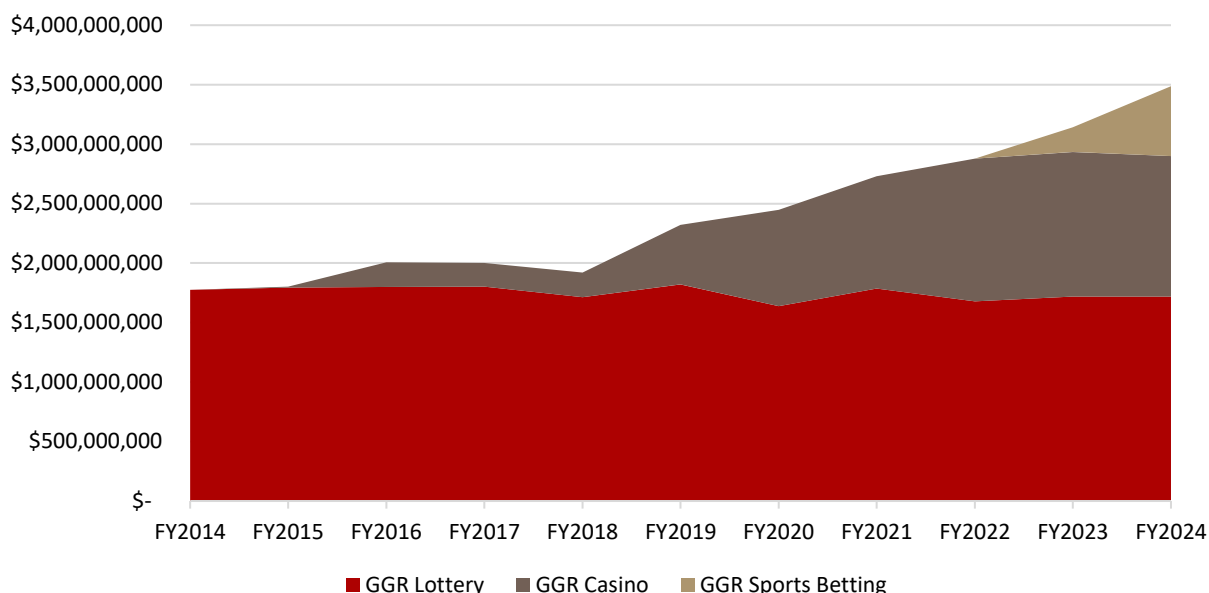
Source: Massachusetts Gaming Commission

Tax revenue related to the legalization of sports betting and casinos has not seen the rapid growth that overall gross gaming revenue has, due to the lower tax rate of casinos and sports betting compared to the nearly 75 percent effective “tax rate” of the lottery.⁴ Because each new form of gambling introduced has had lower tax rates, gross gaming revenue has increased 155 percent over the past decade, compared to 72 percent for gaming tax revenue. Sports betting operators pay a lower proportion of

⁴ While the lottery is not actually “taxed”, on average 75% of gross lottery revenue after prizes are paid out goes to local aid.

gross gaming revenues than casino operators. Resort casino operators including EBH and MGM pay taxes on 25 percent of gross gaming revenues, and PPC, as a slots facility, pays a tax rate of 49 percent on gross gaming revenues. In contrast, in-person and mobile sports betting operators are taxed on 15 to 20 percent of gross sports wagering revenue respectively. If sports betting continues to eat into the market share of the lottery and casinos, this lower tax rate will reduce overall government revenue from gaming. Combined with the lower operating impacts of sports wagering versus casinos, this could also reduce the positive economic impact of expanded gambling in the state.

Figure 4: Gross Gaming Revenue in Massachusetts, FY 2014-2024 (2024 dollars)



Source: Massachusetts Gaming Commission

While the expenditure of taxes collected from sports betting will generally have a positive economic impact, it is important to note that some of the revenue raised from taxes on gambling revenue was earmarked to address negative impacts that the gambling industry might have in Massachusetts. For example, \$12.9 million in taxes from casinos and \$10.6 million in taxes from mobile sports betting were earmarked for Massachusetts' Public Health Trust Fund to support problem gambling research, prevention, treatment and recovery efforts. It could be argued that those funds are not a boon to the Commonwealth, as they are used to fund problems that the expansion of gambling in Massachusetts at least partially exacerbated. At the same time, the expenditure of these funds does have an economic impact, so for the purpose of this exercise, these funds are not treated any differently from other government expenditures.

Local Aid

While tax revenue from sports betting is collected by the state government, 28 percent of that revenue is earmarked for local aid. Local aid consists of state budget funds that flow to city and town budgets in Massachusetts to support essential services like schools, police, fire protection, parks, and public works. These funds are distributed to the Commonwealth's 351 municipalities based on population and community affluence, in order to reduce inequalities in public services that would arise if local budgets relied solely on property tax revenue.

In 2023, just under two-thirds of local aid revenue was distributed in the Metro Boston area, followed by similar amounts distributed to Southeast, Central, and Pioneer Valley regions. The Berkshires and the Cape and Islands receive the least amount.

Table 3: Distribution of Local Aid from Gross Gaming Revenue by REMI Region, 2023

Region	Local Aid
Berkshires	\$2,970,479
Cape and Islands	\$1,361,539
Central	\$16,217,781
Metro Boston	\$83,915,172
Pioneer Valley	\$16,335,206
Southeast	\$19,772,724

Source: Massachusetts Gaming Commission, Massachusetts State Legislature, UMDI Calculations

Changes in Consumer Spending: Patrons and their Spending Patterns

Another important aspect of the economic effects of the gambling industry, or any new industry, is how consumers shift their spending in the face of new industries. Ahead of the legalization of casinos, this matter of consumer reallocation – sometimes referred to as cannibalization – was an important economic factor and a source of concern for many who opposed legalization. The SEIGMA team has endeavored over the course of the project to track these impacts to the best of our ability. To assess patron behavior relative to sports betting, and develop new assumptions for modeling, we are using new data available to the project.

Patron Data

Since our last full economic impact report, the data available to us has changed. Prior casino economic impact studies relied heavily on an in-person survey of casino patrons, which asked questions about the patrons, their spending at the casino, and their relationship with gambling in general. Since then, cost and logistical issues have meant that the SEIGMA team was not able to use the patron survey and needed to update our methods, accordingly, as discussed in the introduction.

Two data sources which were able to partially replace the patron survey are patron origin location data from AirSage and survey data from SEIGMA's 2024 Online Panel Survey (OPS24). Details on both data sources are available in the appendices to this report.⁵ AirSage data allows us to determine the home address of individuals who visited the casinos but does not provide any further information beyond this. It is an important data source for modeling the economic impact of casinos but does not provide any utility in capturing the impact of mobile sports betting. OPS24 offers a rich data set with an extensive range of questions, but only surveys Massachusetts residents. This does leave some gaps in knowledge about the behavior of out-of-state patrons. On the other hand, this approach allows us to collect a significantly larger database providing information about consumer spending behavior (3,383 weighted responses in OPS24) at a reduced cost.

Patron Spending

In order for sports betting to have an economic impact on the Commonwealth, residents need to place bets with the operators. The revenue the operators accrue from these bets is the basis for all operating spending and all taxes paid. The choice to spend money on sports betting rather than some other activity also has its own economic ramifications, in the form of lost revenues to other businesses. On the other hand, money that was recaptured from out-of-state spending does not have an economic impact on Massachusetts outside of those impacts captured elsewhere (operating impacts and new state government revenue). Any negative impacts from the shift in spending occur outside of the state and are outside of the scope of this project. In 2023, bettors placed \$4.7 billion worth of online sports bets in Massachusetts and approximately \$4.25 billion was paid out in prizes to gamblers. The remaining \$454 million represents both the total net losses of gamblers using Massachusetts-based sports betting services, and the gross revenue of those services. These funds are important for the purposes of economic impact studies; both in terms of how they were spent, and what they might have been spent on if sports betting did not exist in Massachusetts.

Of the \$800 million in revenue collected by the mobile sports betting operators in their first 18 months of operation, \$454 million was collected in 2023, with the remaining \$346 million collected in the first

⁵ Evans, V., Volberg, R.A., Williams, R.J. (2024). AirSage Smartphone Location Data: Technical Report. Amherst, MA: School of Public Health and Health Sciences, University of Massachusetts Amherst.

six months of 2024. This suggests that the market for sports betting in Massachusetts continues to expand. This could mean that the sports betting industry's impact on the economy of Massachusetts may be different in future years compared to what we have observed in its first year of existence.

As with prior research on casino spending, our focus is on the two types of spending behavior critical to modeling economic impacts: recapture and reallocation. We were able to estimate the amount of mobile sports betting spending that was recaptured from out-of-state or gray-market sports betting, versus the amount of spending that was reallocated away from other goods and services and towards mobile sports betting. Prior to legalization, it was still possible for individuals to place bets on sporting events, particularly online through offshore sportsbooks. This off-the-books, gray market betting continues to persist as an industry despite legalization, but based on results from the OPS24 survey, the SEIGMA team estimates that 29 percent of spending on mobile sports betting came from patrons who reported that they would have spent their money on some other type of sports betting if mobile sports betting had not been legalized in Massachusetts. In other words, of the \$470 million that was spent on mobile sports betting in Massachusetts, we estimate that almost \$137 million of that would have been spent on some sort of sports betting, legal or otherwise, regardless of whether Massachusetts legalized sports betting. This still leaves approximately \$333 million dollars, 70.9 percent of sports betting spending that the SEIGMA team estimates was reallocated away from other types of economic activities in Massachusetts and towards mobile sports betting.

Table 4: Survey Responses to "If Massachusetts had not legalized sports betting, would you have spent the money that you spent gambling on sports at sportsbooks in other states or countries? (online or in-person)"

Response	Unweighted N	Weighted N	Share of Responses	Share of Weighted Responses	Estimated Share of Spending	Estimated Spending
No	126	64,644	38.3%	28.4%	70.9%	\$333,716,960
Yes	203	162,601	61.7%	71.6%	29.1%	\$136,942,004

Source: OPS24

Responses from OPS24 were transformed into inputs for our economic impact model by region of residence. While recaptured funds are considered "free" money to the Commonwealth (these are funds that would not have been spent in Massachusetts if not for the casino), reallocated funds are modeled as a decrease in consumer spending in each corresponding region. This has the potential to offset some or all the positive economic impacts associated with sports betting (e.g. new government spending).

Table 5: Reallocated and Recaptured Mobile Sports Betting Spending by Region, 2023

Region	Reallocated	Recaptured
Metro Boston	\$113,781,922	\$85,237,313
Southeast	\$19,211,459	\$27,380,804
Pioneer Valley	\$17,494,524	\$13,779,034
Central	\$174,962,893	\$9,079,845
Berkshires	\$802,073	\$1,255,725
Cape and Islands	\$7,464,090	\$209,283
Total	\$333,716,960	\$136,942,004

Source: Massachusetts Gaming Commission, OPS24

Total Economic Impacts: REMI Results

After collecting data on the economic activity for sports wagering summarized above, the SEIGMA team converted the employment and wage, vendor spending, revenue, and consumer spending data collected from operators into inputs for a REMI PI+ economic model. The SEIGMA team also modeled the economic impact of each of Massachusetts' three casinos. We did this for two reasons, to put the sports betting industry into context with the broader expanded gambling landscape, and because some sports betting does occur within the casinos. The SEIGMA team ran a single model which covered all the economic activity at all three casinos including in-person sports betting, as well as separate models breaking out the impacts by source, allowing us to estimate the impacts of different types of operators (e.g. individual casinos) or aspects of the model (e.g. operating impacts versus fiscal impacts).

For modeling purposes, the sports betting operators were grouped into a single group of Category 3 operators rather than presented separately. This was due to the relatively small impact of some of the operators, the less-detailed data that was available to the SEIGMA team when modeling their impact, and the nature of the data use agreements that the SEIGMA team established with the sports betting operators. We are comfortable doing this because our research to date suggests that the bulk of economic impacts occur in the broader economy through new government spending and reallocated consumer spending rather than employment or business to business spending from individual operators.

When all these impacts are taken together, the SEIGMA team estimates that the legalization of gambling in Massachusetts in 2023 created and supported a net of 15,459 jobs across the Commonwealth in both private and public settings. Of these jobs, almost all of them are the result of the casino industry, and just under half are the result of Encore Boston Harbor alone. We estimate that the sports betting industry, taken as a whole, creates or supports approximately 118 net jobs, with a loss of 655 private sector jobs. Legalized gambling also supports almost \$3.6 billion in Output (sales), with \$2.5 billion of that being Value Added (gross state product). Only 2.0 percent of Output from legalized gambling is generated by mobile sports betting. Mobile sports betting's relatively small share is likely a result of its limited in-state vendor spending and limited direct employment.

Table 6: Economic Impacts of Gambling in Massachusetts, 2023

Component	Encore Boston Harbor	MGM Springfield	Plainridge Park Casino	Mobile Sports Betting	Total
Total Employment	7,458	5,000	2,881	118	15,459
Private Non-Farm Employment	5,413	3,742	1,825	-655	10,327
Output (Millions of Dollars)	\$1,874.10	\$1,060.20	\$581.10	\$73.40	\$3,589.20
Value Added (Millions of Dollars)	\$1,418.30	\$714.20	\$336.80	\$49.40	\$2,518.90
Personal Income (Millions of Dollars)	\$632.30	\$317.90	\$247.10	\$55.20	\$1,252.70

Source: Regional Economic Models, Inc., UMDI Calculation

Sports betting's positive impact on the economy is largely due to the revenue it generates for the Commonwealth, and the subsequent expenditure of those funds. For this reason, while approximately 2/3 (10,327) of the total jobs created or supported by the gambling industry as a whole are in the private sector, the impact of sports betting on private sector employment is negative. This is because the positive economic impacts of the sports betting operations in the state (after subtracting economic activity that was already present in the state prior to legalization) are outweighed by the negative impacts to the private sector from reallocated consumer spending. Jobs created or supported in the

public sector by taxes on mobile sports betting (773) outweigh the private sector job loss, so the net employment impact on the Commonwealth is still slightly positive. That said, the estimated number of public sector jobs supported by mobile sports betting is still smaller than the number created or supported by any given casino.

To summarize the impacts of mobile sports betting, we estimate that the reallocation of spending towards sports betting and away from other economic activities leads to the loss of approximately 2,465 jobs in Massachusetts. This number is based on our estimate that 71 percent of sports betting spending is reallocated from other types of spending, rather than recaptured from out of state or black/grey markets. These job losses are offset by estimated 722 jobs created or supported by the operation of the sports books, and an estimated 1,861 jobs created or supported by the expenditure of state tax money in Massachusetts. It is worth noting that these are total job numbers and not sectoral. State government spending can create or support jobs in both the public and the private sector, and revenue generated or lost from changes in economic activity in the private sector can lead to employment gains or losses in the public sector. Nevertheless, as summarized in Table 7, the legalization of sports betting has not led to significant new levels of employment in the Commonwealth, in contrast with the contributions of casinos.

The SEIGMA team ran twelve additional models covering different aspects of the industry's economic impact. Each of these models used a subset of the inputs from the main economic model in order to isolate and quantify the effects of various impacts of the gambling industry. First was a set of models covering "operating impacts," which includes employment, wages, industry sales, value added, and intermediate spending. The next set covered the fiscal impacts, which includes the state and local government revenue raised by the casinos, and their corresponding expenditure. Finally, the third set covers the consumer spending impact, which covers consumer reallocation towards gambling and away from other goods and services, as well as estimated new off-site spending by casino visitors. The impacts from these twelve models are shown in Table 7.

Of these three sets of impacts, operating impacts were the most significant, accounting for an estimated 12,350 jobs supported or created statewide. Fiscal impacts were not far behind, supporting or creating 10,906 jobs. This is in keeping with prior reports from the SEIGMA team, which have also shown the revenue generated by the casinos to be a critical part of their economic impact. In contrast, consumer spending impacts from all three casinos and mobile sports betting were negative, accounting for an estimated loss of 7,794 jobs across the Commonwealth.

Table 7: Employment Impacts by Source and Component

Source of Impact	Encore Boston Harbor	MGM Springfield	Plainridge Park Casino	Mobile Sports Betting	Total
Operating Impacts	7,596	3,444	588	722	12,350
Fiscal Impacts	4,399	2,256	2,389	1,861	10,906
Consumer Spending Impacts	-4,535	-700	-96	-2,465	-7,794
Total	7,458	5,000	2,881	118	15,459

Source: Regional Economic Models, Inc., UMDI Calculation

Nearly two thirds of the jobs created or supported by the gambling industry in Massachusetts were located in the Metro Boston region. Two of Massachusetts' three casinos are located in this region, as is the state capital and many state government jobs funded through casino revenues, so this is expected. Similarly, the presence of MGM Springfield in the Pioneer Valley region is likely the reason that this region has the second highest employment impact from the industry. That said, every region of

Massachusetts saw a net positive economic impact from the legalization of gambling as a whole, even after reallocation.

Table 8: Economic Impacts by REMI Region

Region	Total Employment
Metro Boston	9,555
Southeast	1,098
Pioneer Valley	4,717
Central	266
Berkshires	61
Cape and Islands	216

Source: Regional Economic Models, Inc., UMDI Calculation

Conclusion

Though the economic impacts of the casino industry have been modeled thoroughly in the past, this first year of research shows that the sports betting industry, and mobile sports betting in particular, is quite different from the casino industry in almost every way, except that they both involve gambling. The economic activities these operators engage in, and the degree to which they engage in these activities in Massachusetts, differs from casino operators. As such, the methods and data used to understand these impacts are different from those used for studying casino impacts.

A major finding from our early research on sports wagering is that, in every respect, the positive impacts to the Commonwealth generated by this new industry are dwarfed by the positive impacts generated by other forms of gambling in the state. Casino gambling remains by far the larger driver of economic activity in Massachusetts. While the amount of money wagered, won, and lost in sports betting is significant, the legalization of sports betting has not led to significant new levels of employment in the Commonwealth. Due to an estimated \$333 million in patron spending reallocation, the new activity has had a net negative impact on private employment in other industry sectors and generated a net 118 jobs in contrast with the 15,341 jobs generated by the three casinos. When it comes to spending on Massachusetts businesses, mobile operators spent \$70.8 million on payments to Massachusetts vendors in 2023 or about four percent of payments overall, in contrast to \$84.2 million, or 45.8 percent of payments by casinos to Massachusetts firms.

Sports betting's positive impact on the economy is largely due to the revenue it generates for the Commonwealth, and the subsequent expenditure of those funds. Taxes on sports wagering revenue are 20% and 15% for mobile and retail operators, respectively, which generated a total of \$90.8 million for the Commonwealth in 2023. When considered with casino gross gaming revenue taxes in 2023, sports betting taxes represented 22 percent of all non-lottery gaming tax revenue that year. For comparison, casinos raised nearly \$334 million in tax revenue for the Commonwealth (approximately 78 percent of total non-lottery gaming tax revenue). In terms of overall economic impacts, the new sports betting activity generated \$73.4 million in output, \$49.4 million in value added, and \$55.2 million in personal income in 2023.

The results of our economic modeling exercise indicate that the net economic impact of sports betting is slightly positive, but it is important to note that these results do not account for social impacts that may have "downstream" economic impact, such as bankruptcies and should be viewed with some degree of caution. Taken as a whole, the Massachusetts gambling industry supports a significant amount of economic activity in the Commonwealth. This includes direct employment, vendor spending, and new revenue for state and local governments. The SEIGMA team hopes that these findings will help the MGC to understand how legalized gambling interacts with the rest of the Massachusetts economy.

Appendix 1: Casino Direct Impacts

Direct Impacts

In 2023, casino operators supported nearly 5,130 employees who were paid almost \$268 million in wages for over 9 million hours of work, for an industry-wide average hourly rate of \$29.01 per hour. Mobile sports betting operators employed an average of 10,265 employees across the industry in a quarter. Nearly twelve percent of those employees, an average of 1,185 in a quarter, were employed in Massachusetts. However, the SEIGMA team estimates that about 118 employees are directly attributable to the legalization of mobile sports betting in Massachusetts.

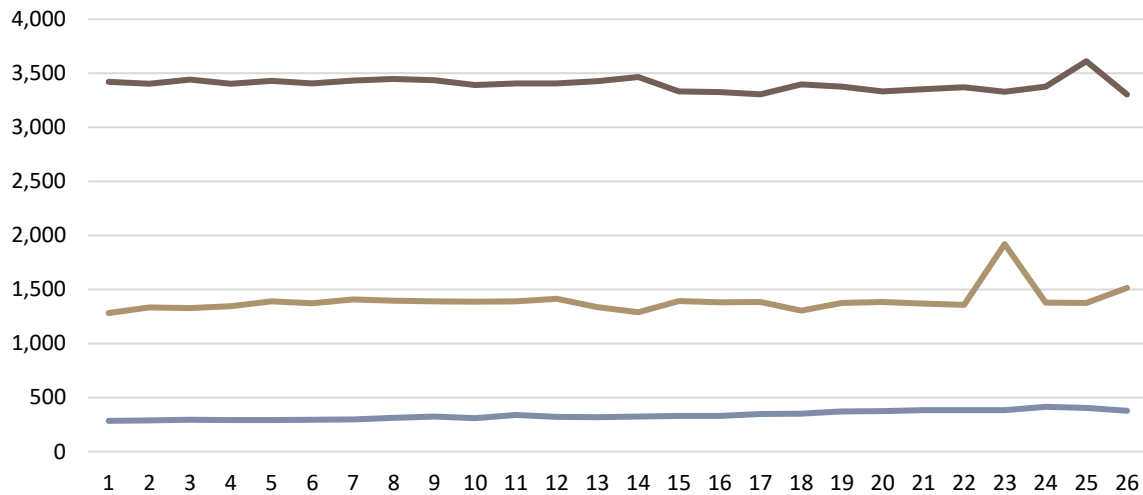
In terms of business-to-business spending, casinos paid a total of \$184 million to vendors to support their operations in 2023. Wholesale trade constituted nearly a quarter of all spending, followed by professional, scientific, and technical services at ten percent. Of the \$184 million, about \$84.2 million, or 45.8 percent of the total, went to Massachusetts-based firms. Mobile operators made a total of \$1.74 billion in payments to vendors across the state and nation in 2023. About four percent of those payments, \$70.8 million, were made to Massachusetts firms. Primarily, operators reported spending needs related to setting up and maintaining data centers in a new location, including hardware costs and tech labor costs.

Employment and Wages

Casinos supported nearly 5,130 employees on a bi-weekly basis throughout the course of 2023. Encore Boston Harbor supported roughly 66 percent of that total, MGM supported 27 percent, and PPC supported 7 percent. Employment in the casino industry in Massachusetts stayed relatively level since the introduction of retail sports betting at the beginning of 2023 with no significant changes even after online sports betting was introduced in March. This trend applies to each casino separately as well.

After a number of tumultuous years following the opening of the three casinos, their closure during the COVID-19 pandemic, and the subsequent reopening process, 2023 was distinguished as being a relatively stable year for casino employment. In order to tally inputs to our economic input model, the SEIGMA team tallied the number of unique employee IDs receiving a paycheck during each pay period of 2023 (featured in Figure 5 below) and then took the average over the years. Nearly 5,130 employees were directly supported by the casinos over the course of 2023. Encore Boston Harbor was consistently the largest employer among the casinos, with an annual average of 3,398 employees per pay period. MGM Springfield was second, with 1,393 employees, and Plainridge Park Casino employed an average of 337 employees per pay period.

Figure 5: Bi-Weekly Employment by Pay Period, 2023



Source: Casino Operator Data, UMDI Calculations

Overall, in the year, casino employees were paid almost \$268 million in wages for over 9 million hours of work, for an industry-wide average hourly rate of \$29.01 per hour. The majority of those wages were paid out by EBH, which is unsurprising given their status as by far the largest employer. On a regional level, the majority of wages for both resort-style casinos were paid to employees living in the region where they worked. Plainridge Park Casino is the exception to this, a fact that can likely be explained by the casino's close proximity to both the Southeast region of Massachusetts and Rhode Island.

Table 9: Hours Worked, and Wages Paid by Casino and Region

Casino	REMI Region	Wages Paid	Hours Worked
Encore Boston Harbor	Metro Boston	\$165,209,576	5,707,640
Encore Boston Harbor	Southeast	\$6,179,838	193,148
Encore Boston Harbor	Pioneer Valley	-	-
Encore Boston Harbor	Central	\$2,229,817	69,949
Encore Boston Harbor	Berkshires	-	-
Encore Boston Harbor	Cape and Islands	-	-
Encore Boston Harbor	Out of State/Nation	\$17,473,469	548,932
MGM Springfield	Metro Boston	\$574,723	14,381
MGM Springfield	Southeast	-	-
MGM Springfield	Pioneer Valley	\$42,630,778	1,589,533
MGM Springfield	Central	\$580,708	19,701
MGM Springfield	Berkshires	-	-
MGM Springfield	Cape and Islands	-	-
MGM Springfield	Out of State/Nation	\$16,337,065	480,515
Plainridge Park Casino	Metro Boston	\$2,856,980	103,524
Plainridge Park Casino	Southeast	\$7,007,213	254,536
Plainridge Park Casino	Pioneer Valley	-	-
Plainridge Park Casino	Central	\$310,114	15,435
Plainridge Park Casino	Berkshires	-	-
Plainridge Park Casino	Cape and Islands	-	-
Plainridge Park Casino	Out of State/Nation	\$5,551,079	209,477
Total	Total	\$267,859,935	9,234,537

Source: Casino Operator Data, UMDI Calculations

Note: Casino-Region combinations with less than 10,000 hours worked were omitted to protect the confidentiality of individual casino employees

Vendor Spending

Casinos paid a total of \$184 million to vendors to support their operations in 2023. Wholesale trade constituted nearly a quarter of all spending, followed by professional, scientific, and technical services at ten percent. Of the \$184 million, about \$84.2 million, or 45.8 percent of the total, went to Massachusetts-based firms. As operators of large physical facilities in the state, casino operators spend a large proportion of operating expenditures on in-state vendors.

Business-to-business spending by casinos is an important component of the greater economic impact of the casino industry. In addition to the wages paid to employees, casino operators made millions of dollars in payments to third party vendors throughout 2023. These payments include purchases of goods from vendors, such as food and alcohol, payments to utility companies and third-party service providers, along with payments made on behalf of employees to various unions and membership organizations and charitable contributions. Overall, the casino industry paid a total of about \$184 million to various vendors, with Encore Boston Harbor contributing \$91.7 million, MGM Springfield contributing

\$68.4 million, and Plainridge Park Casino contributing \$23.9 million. Of the \$184 million, about \$84.2 million, or 45.8 percent of the total, went to Massachusetts-based firms.

Table 10 shows the top private industry sectors to which casino operators made business-to-business payments. Wholesale trade was the prominent top industry in terms of spending across the three casinos, accounting for 22.9 percent of all spending. Following wholesale trade is professional, scientific, and technical services at ten percent of spending. Common types of vendors in this industry include legal consulting, marketing, and IT services. Retail trade is the third most prominent industry with 6.7 percent of overall spending across the casinos.

Table 10: Top 10 Industries by Vendor Spending

Industry	Encore Boston Harbor	MGM Springfield	Plainridge Park Casino	Total
Wholesale trade	\$20,108,089	\$13,485,112	\$8,459,858	\$42,053,060
Prof., scientific, and technical services	\$8,611,591	\$8,363,097	\$1,498,882	\$18,473,570
Retail trade	\$10,485,155	\$944,860	\$850,372	\$12,280,387
Construction	\$9,919,171	\$1,511,874	\$580,474	\$12,011,518
Transit and ground passenger transportation	\$9,257,514	\$910,442	\$85,781	\$10,253,737
Performing arts, spectator sports, and related industries	\$1,376,670	\$6,522,584	\$1,355,344	\$9,254,598
Administrative and support services	\$3,674,958	\$4,039,389	\$1,537,609	\$9,251,957
Amusement, gambling, and recreation	\$183,082	\$5,592,021	\$3,225,436	\$9,000,539
Insurance carriers and related activities	\$937,203	\$5,804,814	\$70,038	\$6,812,055
Personal and laundry services	\$4,967,660	\$1,093,891	\$36,069	\$6,097,620
All Other Industries	\$22,207,602	\$20,110,808	\$6,210,568	\$48,528,978
Total	\$91,728,694	\$68,378,893	\$23,910,432	\$184,018,018

Source: Casino Operator Data, UMDI Calculations

Table 11 below breaks down vendor spending by regions in the state as well as the totals for spending out of the state. The majority of spending across the casino industry is done out-of-state, with 54.2 percent of spending going to vendors outside of Massachusetts. The second most prominent region was Metro Boston, consisting of Suffolk, Essex, Middlesex, and Norfolk Counties, which received 29.1 percent of all spending from casinos in 2023. The totals for Metro Boston are heavily influenced by Encore Boston Harbor, which is situated in the region and also spends more than the other two casinos. Outside of Metro Boston, the Pioneer Valley is the second-largest beneficiary with 9.1 percent of spending, followed by Southeast with 6.3 percent of spending. Much like Encore Boston Harbor influenced the Metro Boston spending, MGM Springfield's largest in-state region in terms of spending is the Pioneer Valley while Plainridge Park Casino's is Southeast, the regions in which they both operate.

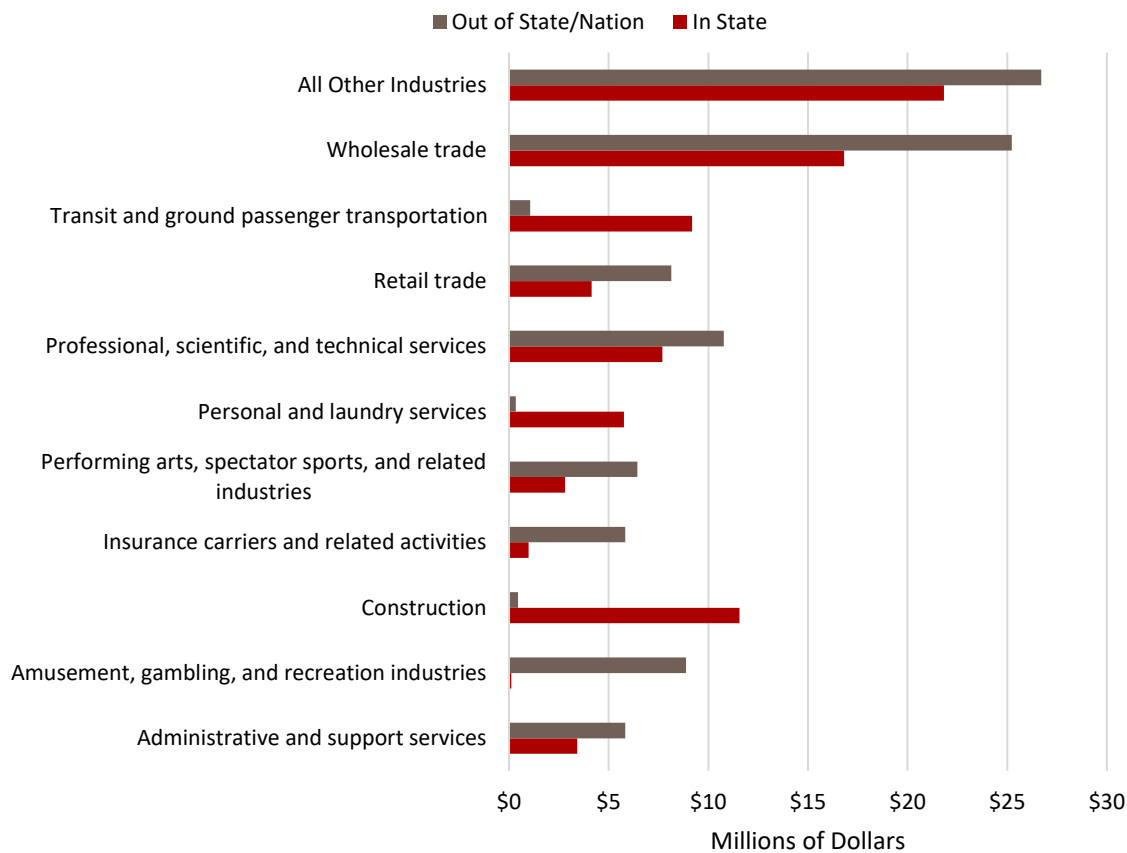
Table 11: Vendor Spending by REMI Region

Region	Encore Boston Harbor	MGM Springfield	Plainridge Park Casino	Total
Metro Boston	\$40,815,841	\$6,417,513	\$6,287,844	\$53,521,198
Southeast	\$7,595,539	\$1,994,724	\$2,077,396	\$11,667,659
Pioneer Valley	\$317,191	\$15,965,202	\$498,264	\$16,780,658
Central	\$1,733,546	\$245,916	\$216,825	\$2,196,287
Berkshires	\$2,640	\$107,229	\$0	\$109,869
Cape and Islands	\$53,847	\$0	\$0	\$53,847
Out of State/Nation	\$41,210,090	\$43,648,308	\$14,830,103	\$99,688,501
Total	\$91,728,694	\$68,378,893	\$23,910,432	\$184,018,018

Source: Casino Operator Data, UMDI Calculations

Figure 6 shows the breakdown of business-to-business spending between in-state and out-of-state or out of nation spending for the casino industry in 2023. Most of the spending done out-of-state went to firms in the wholesale trade, professional, scientific, and technical services, and amusement, gambling, and recreation industries. It is likely that most of these out-of-state payments were made to companies with whom the parent companies of the casinos have an existing relationship. For in-state spending, the most prominent industries provide products and services for which proximity to the casino is important including wholesale trade, construction, and transit and ground passenger transportation.

Figure 6: In-State and Out-of-State Spending by Industry



Source: Casino Operator Data, UMDI Calculations

Public Sector Impacts

In 2023, casinos grossed nearly \$1.2 billion in revenue from gaming in Massachusetts, raising nearly \$334 million in tax revenue for the Commonwealth (approximately 78 percent of non-lottery gaming tax revenue). Of the tax revenues raised, Encore Boston Harbor contributed nearly \$189 million (57 percent of the total), Plainridge Park Casino paid \$76 million (23 percent), and MGM Springfield paid nearly \$69 million (21 percent).

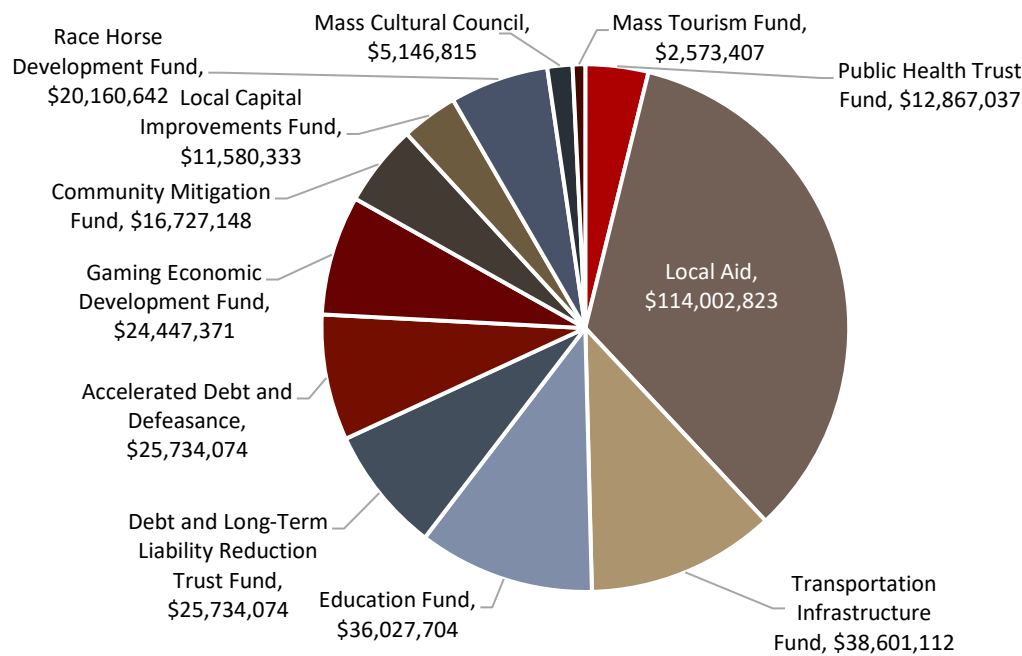
One major reason for the legalization of gambling in Massachusetts was the increased tax revenue expected by state legislators. Category 1 resort-style casinos (Encore Boston Harbor, MGM Springfield) pay 25% of their gross gaming revenue (GGR) to the state and the Category 2 slots parlor (Plainridge Park Casino) pays 49% of their gross gaming revenue. Total GGR tax revenue has increased from \$78 million in FY 2016, when just PPC was open, to over \$330 million in FY 2024, with all three casinos open and operational. In CY 2023, the casino industry paid \$333.6 million in gross gaming revenue taxes to the Commonwealth.

Table 12: Casino Revenue 2023

Casino	Gross Gaming Revenue	Tax Revenue
Encore Boston Harbor	\$754,837,855	\$188,709,464
MGM Springfield	\$274,525,119	\$68,631,280
Plainridge Park Casino	\$155,636,323	\$76,261,798
All Casinos	\$1,184,999,297	\$333,602,542

Source: Massachusetts Gaming Commission

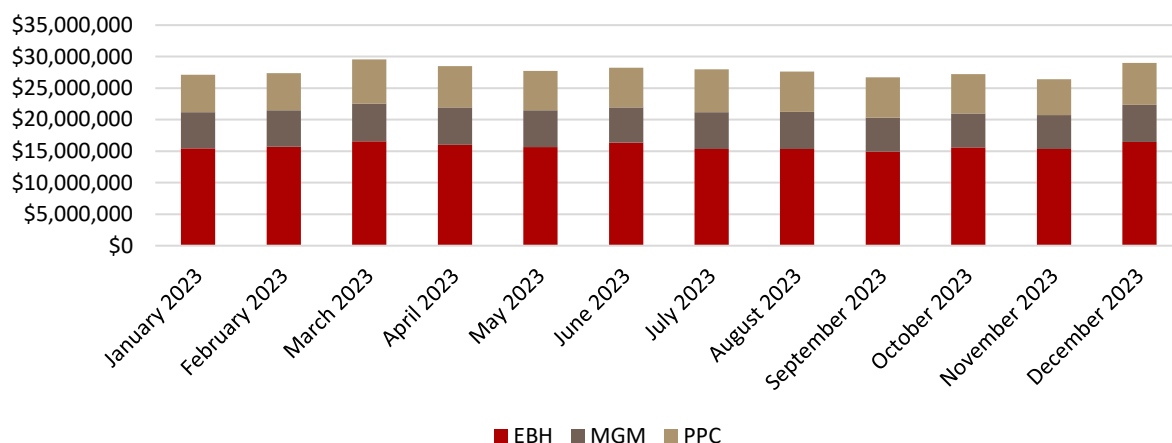
This GGR tax is then allocated to 12 different state funds as seen in Figure 7, with the largest being Local Aid to Massachusetts' 351 cities and towns that is distributed based on population size and level of economic need. In CY 2023, the Local Aid fund received over \$114 million from gross gaming revenue taxes. The other major areas of funding are the Transportation Infrastructure fund and the Education Fund, which both received over \$35 million; a combined \$50 million towards funds addressing state debt; almost \$25 million to the Gaming Economic Development Fund, which funds various industry and workforce development initiatives; and over \$16 million to the Community Mitigation Fund, which is available to help local communities affected by the casinos, along with other smaller amounts for public health, local capital improvements, and cultural/tourism funding. Notably, the Race Horse Development Fund was slated to receive over \$20 million in FY 2024 despite no currently operating thoroughbred race tracks in the state.

Figure 7: Disbursement of Taxes on Casino Gross Gaming Revenue CY23

Source: Massachusetts Gaming Commission

Unlike sports betting, which tends to see large fluctuation month to month depending on which sports are currently in season, casino spending remains relatively stable year-round. EBH provides between 50-60 percent of monthly tax revenue, with PPC typically providing around 25 percent and MGM providing around 20 percent. Notably, MGM's gross gaming revenue is nearly twice that of PPC; however, PPC, as a Category 2 casino licensee, is taxed at nearly twice the rate of MGM and EBH (49 percent vs 25 percent).

Figure 8: Monthly State Revenue Collected from Casino Gross Gaming Revenue CY23



Source: Massachusetts Gaming Commission

Patron Spending

Casino patrons placed \$9.7 billion worth of bets at Massachusetts casinos in 2023, of which approximately \$8.5 billion was paid out in prizes, with the remaining \$1.2 billion representing both net losses to casino gamblers and the gross revenue of casinos. In total, casino patrons spent nearly \$1.4 billion at Massachusetts casinos in 2023 (inclusive of gross gaming revenue and other on-site spending), with an additional \$133 million in spending off-site at local businesses. Just over \$1 billion of on-site spending is estimated to have been reallocated from other industries in Massachusetts, with an estimated \$376 million in recaptured spending that would not have occurred in the Commonwealth if not for the casinos.

Most casino patrons were Massachusetts residents, although the share varied by casino. Situated close to the Connecticut border, MGM Springfield attracted the highest share of out-of-state patrons, at 38 percent. Despite also being located close to a state border, Plainridge Park Casino has the lowest share, at 8.2 percent. In the absence of any additional data on the behavioral decisions of these patrons, the SEIGMA team made a series of simplifying assumptions, based on in-person survey findings, for the purpose of this economic impact analysis. The first is that the per-patron spending of out-of-state casino patrons is similar to that of in-state casino patrons, and therefore the share of out-of-state patrons at each casino also approximates the share of gambling and non-gambling spending originating from these patrons. The second is that these patrons traveled to Massachusetts to gamble and would not have otherwise spent their money in Massachusetts. While our previous patron survey data tells us that these assumptions are not perfect, we believe they are the most reasonable assumptions to make in the face of lack of richer data on out-of-state patron behavior.

Table 13: Share of In-State and Out-of-State Patronage

Casino	Massachusetts Patrons	Out-of-State Patrons
Encore Boston Harbor	80.6%	19.4%
MGM Springfield	62.0%	38.0%
Plainridge Park Casino	91.8%	8.2%

Source: AirSage data, UMDI Calculations

Another important policy discussion ahead of the legalization of casinos in Massachusetts surrounded the recapture of existing casino spending by Massachusetts residents. Prior to legalization, Massachusetts residents would leave the state to gamble at out-of-state casinos, particularly in Connecticut and Rhode Island. While Massachusetts residents still do leave the state to patronize those casinos, the spending that now occurs in Massachusetts, rather than out-of-state, is considered recaptured spending. While that lost spending might have an impact on the economies of these neighboring states, from the perspective of Massachusetts, it is new spending that would not have occurred in the Commonwealth if not for the casinos.

For Massachusetts residents whose spending is not recaptured, the SEIGMA team considered their spending to be reallocated. This represents a shift in consumer spending towards spending on casinos. For the purpose of economic modeling, this was accomplished by taking the estimated amount spent at casinos and subtracting an equivalent sum of money from the consumer spending by Massachusetts residents, reflecting that these consumers are spending more on casinos and less on other goods and services.⁶ This reduction of spending is referred to as reallocation, and based on the results of the OPS24 survey, it constitutes the majority of spending by casino patrons across all three casinos. Encore Boston Harbor had the highest share of reallocated patron gaming spending, which could be a function of its location in the Greater Boston area, while the other two casinos are located close to the state border.

Table 14: Recaptured Casino Spending

Casino	Spending Type	Gaming Spend	Non-Gaming Spend	Gaming Share	Non-Gaming Share
Encore Boston Harbor	Reallocated	\$574,475,421	\$155,011,681	75.6%	71.4%
Encore Boston Harbor	Recaptured	\$185,319,491	\$62,106,026	24.4%	28.6%
MGM Springfield	Reallocated	\$174,360,787	\$68,201,263*	63.4%	77.5%
MGM Springfield	Recaptured	\$100,802,214	\$19,800,395*	36.6%	22.5%
Plainridge Park Casino	Reallocated	\$9,904,830	\$9,142,308	58.0%	81.7%
Plainridge Park Casino	Recaptured	\$7,183,355	\$2,053,036	42.0%	18.3%

Source: Massachusetts Gaming Commission, casino operating data, OPS24, UMDI Calculation

Note: MGM Springfield did not provide non-gaming revenue for 2023. As a result, non-gaming revenue/spend numbers used for this projection are an estimate based on the ratio of gaming and non-gaming revenues at the other two casinos. Share represents the share of spending at that casino that is recaptured or reallocated.

⁶ This is also a simplifying assumption. In reality, the expansion of gambling in Massachusetts could and likely often does cause casino patrons to both shift their gambling away from out-of-state casinos and towards in-state casinos as well as changing the total amount that they spend. The current SEIGMA survey relies on patrons accurately assessing how their behavior would have been different if casino gambling and sports betting had never been legalized in Massachusetts. This already relies on people to make honest and accurate assessments of how their behavior would be different in a hypothetical situation. Whenever possible, we attempted to make those questions as simple as possible.

Patron Spending Off-Site

While most patron spending occurs at the casino, casino visitors, particularly casino visitors from outside the immediate area, might spend money in the region outside the casino in the course of their visit. The SEIGMA team estimated the amount of off-site spending at the casinos by comparing reported off-site and on-site non-gambling spending from the OPS24 survey to the casinos' own reported non-gambling spending, where available. While small compared to on-site spending, the SEIGMA team estimates that casino patrons spent approximately \$133 million in the Massachusetts economy in the course of their visits, about 10 cents for every dollar spent at the casinos.

Table 15: Share of Casino Patron Spending

Casino	Gross Gaming Revenue	Non-Gaming Revenue	Estimated Off-Site Spending	Total
Encore Boston Harbor	\$759,794,912	\$217,117,707	\$69,287,800	\$1,046,200,419
MGM Springfield	\$275,163,001	\$88,001,658	\$55,737,735	\$418,902,394
Plainridge Park Casino	\$17,088,186	\$11,195,344	\$8,071,924	\$36,355,454
Total	\$1,052,046,099	\$316,314,709	\$133,097,459	\$1,501,458,266

Source: Casino operating data, Massachusetts Gaming Commission, OPS24, UMDI Calculation

Appendix 2: Methodology

Overview

In the broadest sense, the goal of this report is to catalog as accurately as possible the ways in which the Massachusetts economy has been changed by the legalization of sports betting. Once those changes have been identified and quantified, they are turned into inputs to the SEIGMA team's REMI PI+ economic model. The output from this model allows us to capture the "ripple effects" that are caused by these initial impacts. For example, if a worker is hired at the casino, the model will allow the SEIGMA team to estimate the amount of additional spending in the Massachusetts economy that will be generated from that individual being employed. Or, if a mobile sportsbook makes a payment in taxes to the state government, the model will be able to estimate the number of jobs and intermediate spending generated by that money being spent by the government. The model can provide an estimate of this secondary/tertiary economic activity provided that it receives the correct primary inputs.

Because this report is intended for the Massachusetts Gaming Commission and a broader audience of policymakers and stakeholders in Massachusetts, we have constrained our analysis to economic activity that a) occurs in the gambling space (casinos and sports betting) and b) would not have occurred in Massachusetts if the Commonwealth had not legalized gambling. So, if there were a business in Massachusetts that was supplying goods or services to an out-of-state casino, that would not be included in our analysis, and in fact we would not receive any data on that. For similar reasons, economic activity related to mobile sports betting is excluded from our analysis in cases where the SEIGMA team determined that activity to be a continuation of activity that pre-dated the legalization of mobile sports betting in Massachusetts, and that likely would have continued regardless of whether or not Massachusetts legalized sports betting.

REMI's PI+ model is a commercial, off-the-shelf software program for assessing regional economic impacts used throughout the country for over 40 years. It relies on a wide array of built-in assumptions and parameters to estimate economic impacts including elements of input-output and general equilibrium models. As with all commercial software products, its source code is not available to the public. However, REMI does provide a description of the model's methods and equations available here: [Model Equations](#). The economic impact analysis provides useful estimates of the direction and magnitude of gaming's economic impacts to be used alongside other quantitative and qualitative evidence when evaluating potential policy actions. Accordingly, in research for the SEIGMA project, economic impact modeling is used as one of several types of quantitative and qualitative analysis used to understand the impacts of legalized gambling.

The following sections summarize the data that the SEIGMA team collected from the operators, the Commonwealth, and gamblers in Massachusetts in order to build our economic model.

Operating Data

From the start of casino operations in Massachusetts, the three casino operators have supplied operating data to the SEIGMA team at regular intervals. These data include detailed records of employment, wages, vendor spending, attendance, and non-gaming revenue. These data have always formed the core of the SEIGMA team's economic modeling exercises and will continue to do so.

With the introduction of sports betting in Massachusetts, the SEIGMA team engaged with the operators to collect operating data for these entities as well. For Category 1 sports betting (in-person sports wagering at the casinos) this was fairly straightforward. Most of these operations were well-integrated into the same accounting systems that the casino operators already used to provide us with data on the rest of their operations. In cases where a third-party entity was involved, we were able to get high-quality data from the casino operator. In many cases, the Category 1 operations were difficult to distinguish from the rest of the casino operation. For example, an HR worker at a casino would handle HR matters for both sports-betting and non-sports-betting employees, and a vendor providing uniforms to a casino would provide them for both types of employees as well. For this reason, we present all Category 1 sports betting operations rolled in with the broader operations of their respective casinos.

When it came to Category 3 (mobile sports betting) operators, we needed to engage with a whole new group of operators to get the operations data necessary for this report. Much of that data collection process was conducted in service of two other deliverables from the SEIGMA project – the Early Impacts of Sports Betting report and the Diversity in Sports Betting report. The level of detail that we collected from these operators is less than what was collected from casino operators. There are several reasons for this, from the complexity of working with a large number of new operators in a rapidly changing field, to the nature of the data sharing agreements that were negotiated, to, perhaps most importantly, the relatively small economic footprint that each of these organizations had in Massachusetts. The one exception to this last point, DraftKings, had an established presence in Massachusetts long before the legalization of sports betting.

Given the low levels of economic activity specifically supported by the Massachusetts sports wagering, industry, it is clear that operational impacts are minimal. Rather than focusing on operational impacts, the SEIGMA team believes that economic impact work around mobile sports betting should focus instead on two factors: the impact of new state revenue, and the impact of consumer reallocation towards sports betting and away from other goods and services. These impacts were measured for casino impact studies in the past, but they will take on additional significance in sports betting studies, given the lack of major operating impacts. The MGC collects rich data on operator gross gaming revenues, and in lieu of on-site patron surveys that in prior casino reports provided information on patron behavior, we will use SEIGMA's online panel survey (OPS) data to gain insight into consumer behavior.

Fiscal Data

Data on gambling revenue and taxes paid is collected and published by the MGC on a monthly basis. This data informed two important parts of our analysis. First, it provides a number for the amount of revenue raised from legalized gambling in a given year. In performing an economic impact analysis, the SEIGMA team models a corresponding increase in government spending to reflect the impact of these new revenues. Due to the fungibility of government funds, we do not make any attempt to model the impact on specific programs that may have been funded via the casino revenue. We do however break out local aid from the rest of government spending, and we model that as local government spending rather than state government spending. Second, this data provides us with information on the amount of money lost by gamblers in Massachusetts. This is a key component in modeling consumption reallocation.

Online Panel Survey (OPS24)

In place of on-site patron surveys that in prior casino reports provided information on patron behavior, we use SEIGMA's online panel survey (OPS) data to gain insight into consumer behavior.

Online panels are commonly used in market research and increasingly in academic studies.⁷ The advantages of online panel surveys are that the validity of answers to 'sensitive questions' (e.g., gambling) tends to be higher in self-administered formats; everyone has agreed and expects to be contacted (unlike telephone surveys); the results are obtained in a much shorter period of time; and they are much less expensive than probability sampling surveys.⁸

The main limitation of online panels is that panelists are not randomly selected but rather self-enrolled. While online panel companies generally stratify their samples to be demographically representative of the population, significant behavioral biases typically remain that are not corrected by this stratification or by demographic weighting.⁹ In particular, online panels contain people with much higher levels of gambling and problem gambling. However, these behavioral biases are an advantage in studies such as SEIGMA where these biases can be utilized to obtain a higher 'yield' of people with gambling problems to better understand the features of this important subgroup.

While the online panel surveys have been historically used in SEIGMA primarily to understand the nature of MA problem gamblers, they can be used in a similar manner to the population surveys to examine changes from one time period to the next because behavioral biases are constant across surveys. To date there have been three online panel surveys in Massachusetts as listed in Table 1 (online panel surveys will continue on an annual basis for the foreseeable future). All online panel data in this report has been weighted to match the population census.

This year, the SEIGMA team used panel survey data for the first time to help measure consumer reallocation. Questions in the 2024 survey were developed with a clear focus towards understanding the economic impact of sports wagering. Questions were added to obtain information about sports betting participation and about non-gambling expenditures at Massachusetts casinos. Respondent answers to questions in the OPS24 survey were used to determine the populations of gamblers at each casino and at mobile sportsbooks. From there, they were used to determine the share of gamblers and of gambling spending that was recaptured versus reallocated, and to determine the geographical distribution of the gamblers. A key limitation of using survey and panel questions to determine economic impacts is the difficulty of obtaining accurate spending estimates from survey respondents. An in-depth discussion of these limitations can be found in a 2023 SEIGMA report (Appendix E1: Gambling expenditure data).¹⁰

Table 16: Online Panel Surveys in Massachusetts¹¹

Survey	Time Period	Sample Size	Survey Company
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⁷ Callegaro, M., Baker, R., Bethlehem, J., Göritz, A.S., Krosnic, J.A., Lavrakas, P.J. (2014). Online panel research: History, concepts, applications and a look at the future. In M. Callegaro, R. Baker, J. Bethlehem, A.S. Göritz, J.A. Krosnic, P.J. Lavrakas (Eds.). *Online Panel Research: A Data Quality Perspective*. West Sussex: John Wiley & Sons, Ltd.

⁸ Olson K., Smyth, J.D., Keeter, S., Lesser, V., et al. (2021). Transitions from telephone surveys in self-administered and mixed-mode surveys: AAPOR Task Force report. *Journal of Survey Statistics and Methodology*. 9(3):381-411. <https://doi.org/10.1093/issam/smz062>

⁹ Williams, R.J., Zorn, M., Volberg, R.A. & Evans, V. (2023). Can the Behavioral Biases of Opt-In Online Panels be Eliminated or Reduced through Corrective Weighting? Amherst, MA: School of Public Health and Health Sciences, University of Massachusetts Amherst.

¹⁰ Volberg, R. A., Williams, R. J., Zorn, M., Evans, V. (2023). Gambling and Problem Gambling in Massachusetts: Results of a Follow-up Population Survey. Amherst, MA: School of Public Health and Health Sciences, University of Massachusetts Amherst.

¹¹ Williams, R.J., Pekow, P.S., Volberg, R.A., Stanek, E.J., Zorn, M., & Houpt, K.A. (2017). Impacts of Gambling in Massachusetts: Results of a Baseline Online Panel Survey (BOPS). Amherst, MA: School of Public Health and Health Sciences, University of Massachusetts Amherst.

Baseline Online Panel Survey (BOPS)	October 2013 – March 2014	5,046	Ipsos ⁵
Follow-Up Online Panel Survey (FOPS)	March 2022	3,038	Qualtrics
Online Panel Survey 2023 (OPS23)	March – May 2023	3,380	Qualtrics
Online Panel Survey 2024 (OPS24)	March - April 2024	TBD	Qualtrics

Patron Origin Data

While online panel surveys offer valuable insights about gambler behavior, the sample of respondents is constrained to Massachusetts residents. From prior research, the SEIGMA team is aware that a significant share of casino patrons come from neighboring states. Without an on-site patron survey, the SEIGMA team does not have a way of reaching these gamblers to ask them about their behaviors, but we were able to gather data on the origin of casino patrons using cell phone tracking data from AirSage.¹² Without an opportunity to directly interview out-of-state gamblers about their activities, some simplifying assumptions were necessary to model their behavior. In particular, the assumption was made that all out-of-state gamblers were visiting Massachusetts in order to visit the casino and would not have visited otherwise. While this is not ideal, the AirSage data probably does provide the SEIGMA team with a more robust sample of patrons’ geographic origins than was previously available via patron survey data.

Some disadvantages of AirSage data in estimating patron origins are: data collection is biased towards frequent patrons and thus overcounts their corresponding origin locations; it presents some difficulty distinguishing employees from patrons, potentially conflating employee origin locations with patron origin locations; it does not assess patron decision-making related to spending (for example, off-site spending areas; shifts in spending away from other locations, etc.); and it only collects patronage estimates for land-based venues, therefore, mobile sports wagering patrons are not measured.¹³

Economic Modeling Methodology

For the SEIGMA project, the research team works with a customized model from Regional Economic Models, Inc. (REMI), built with appropriate sub-state regions to measure casino facility regions and the rest of Massachusetts. The REMI model is comprised of comprehensive economic data and assumptions about economic relationships and linkages across industries which enables the analysis of new policies and economic change within a state or region. While there is another major commercial model available (IMPLAN software), using REMI allows for multi-year modeling and forecasting. The IMPLAN system is more commonly used for the analysis of an event at a specific point in time. The REMI P+ software is specifically customized to generate realistic, year-by-year estimates of the total regional effects of initiatives such as expanded gaming. Also, obtaining the REMI model allows a unique opportunity to

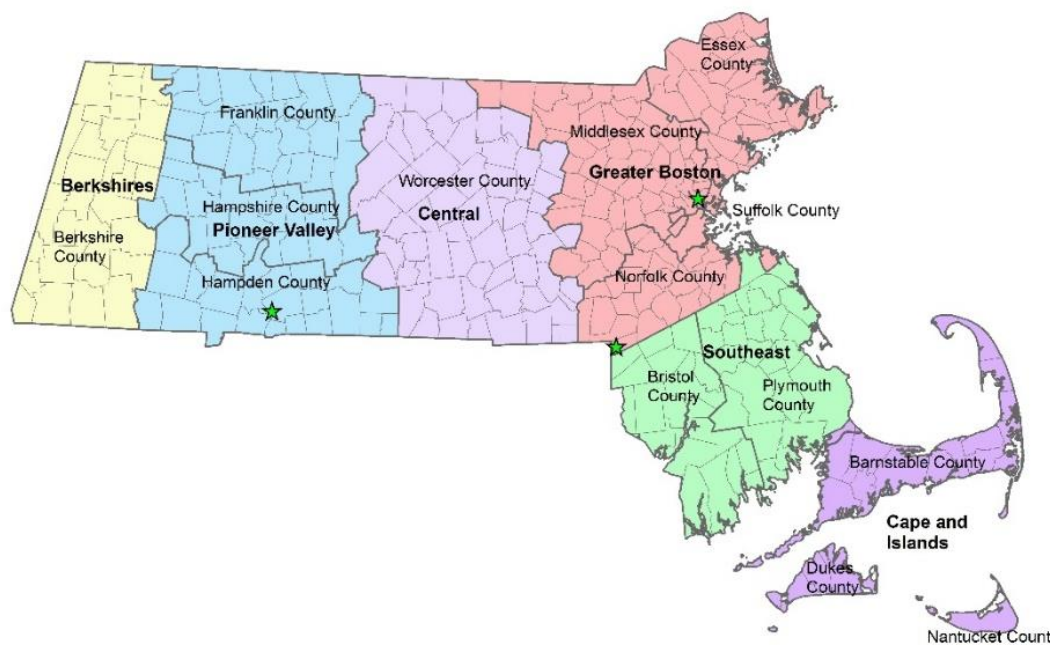
¹² The SEIGMA research team has published two reports exploring patron survey alternatives using smartphone location data in combination with online panel surveys to replace our earlier method using on-site patron and license plate surveys.

¹³ For a detailed discussion examining the overall reliability, validity, and utility of AirSage data as a method of determining patron origin see Evans, V., Volberg, R.A., Williams, R.J. (2024). AirSage Smartphone Location Data: Technical Report. Amherst, MA: School of Public Health and Health Sciences, University of Massachusetts Amherst.

measure predicted economic impacts and then compare these economic impact projections with actual outcomes measured by this research project.

The REMI model for this project is built out of custom configurations of counties which can be matched with the three regions defined by the Expanded Gaming Act and to the regions impacted by the three land-based facilities. See Figure 1 for a map showing these regions. For this report, the SEIGMA team continued to use the same county configuration that has been used from all previous reports, as shown in Figure 9 below. Annual employment was modeled using the average employment across all pay periods in 2023. The REMI model's assumptions around sales, value added, and commuter earnings were adjusted based on primary data from the operators. Vendor data was manually coded for industry and then run, with the REMI model's assumptions about intermediate spending having been manually nullified. New state and local revenue was modeled as an equal increase in state and local government spending. Consumption reallocation was modeled based on shares of reported spending and answers to questions in the OPS24 data and then modeled as a decrease in spending on other goods and services. New off-site spending was modeled as tourism spending.

Figure 9: REMI Regions



Appendix 3: The PI+ Model

PI+ is a structural economic forecasting and policy analysis model. It integrates input-output, computable general equilibrium, econometric, and economic geography methodologies. The model is dynamic, with forecasts and simulations generated on an annual basis and behavioral responses to compensation, price, and other economic factors.

The model consists of thousands of simultaneous equations with a structure that is relatively straightforward. The exact number of equations used varies depending on the extent of industry, demographic, demand, and other detail in the specific model being used. The overall structure of the model can be summarized in five major blocks: (1) Output and Demand, (2) Labor and Capital Demand, (3) Population and Labor Supply, (4) Compensation, Prices, and Costs, and (5) Market Shares. The blocks and their key interactions are shown in **Error! Reference source not found.** and **Error! Reference source not found.**

Figure 10: REMI Model Linkages

REMI Model Linkages (Excluding Economic Geography Linkages)

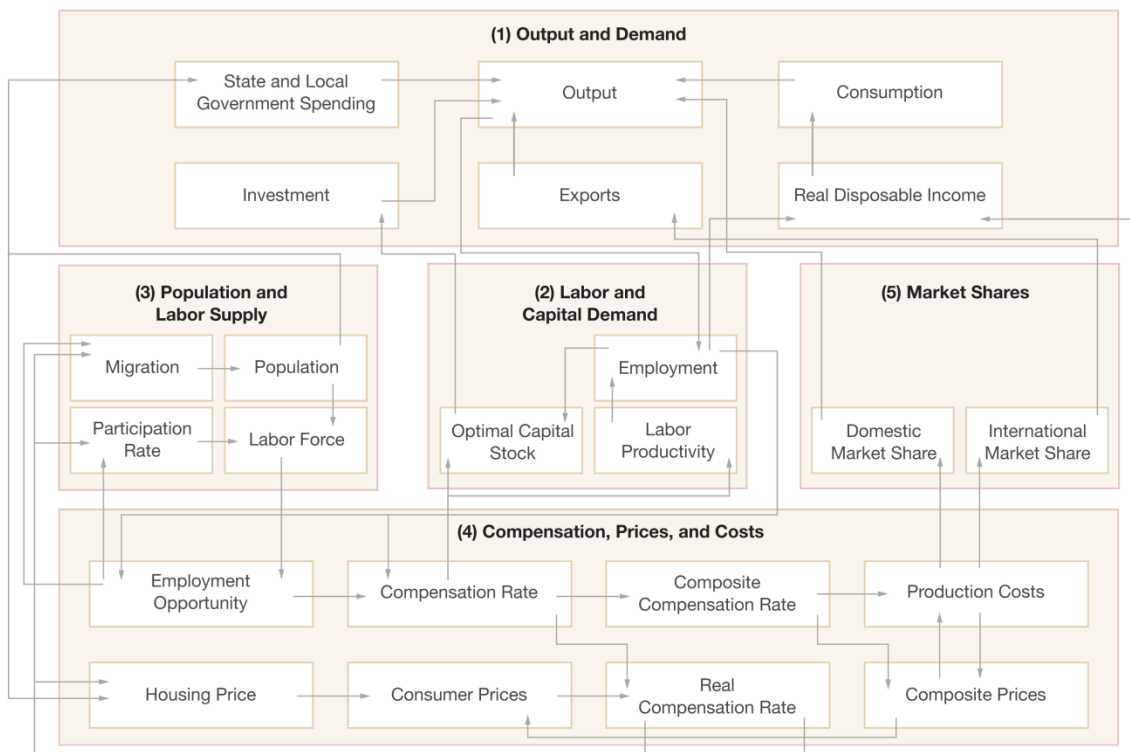
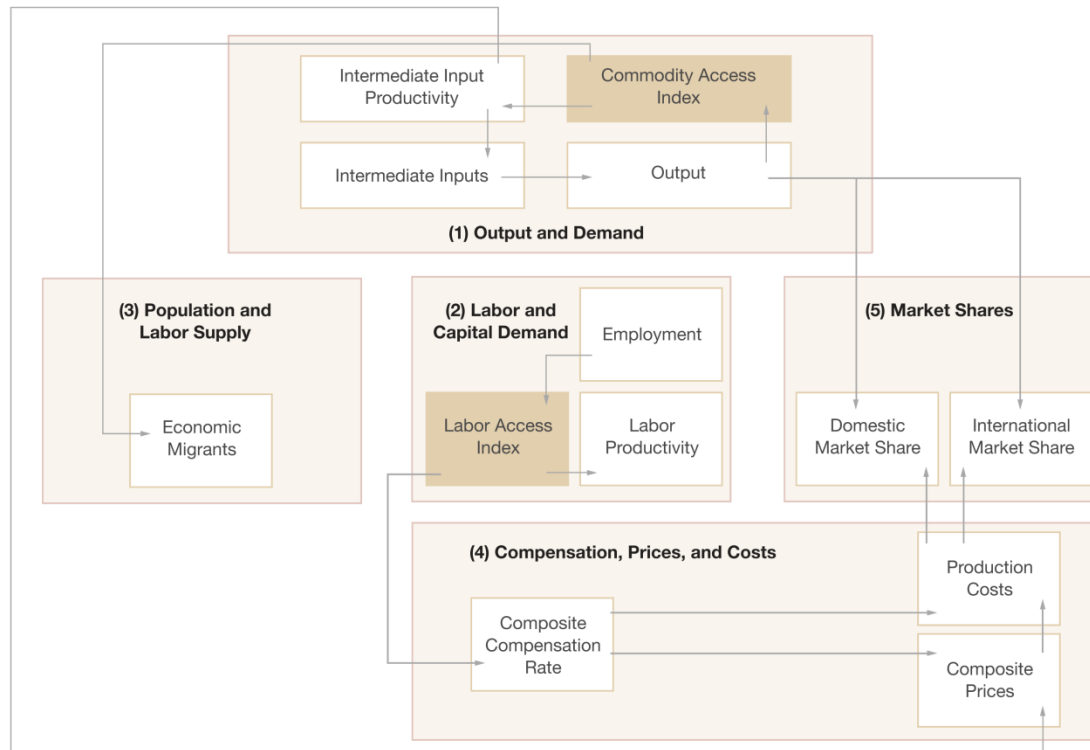


Figure 11: Economic Geography Linkages



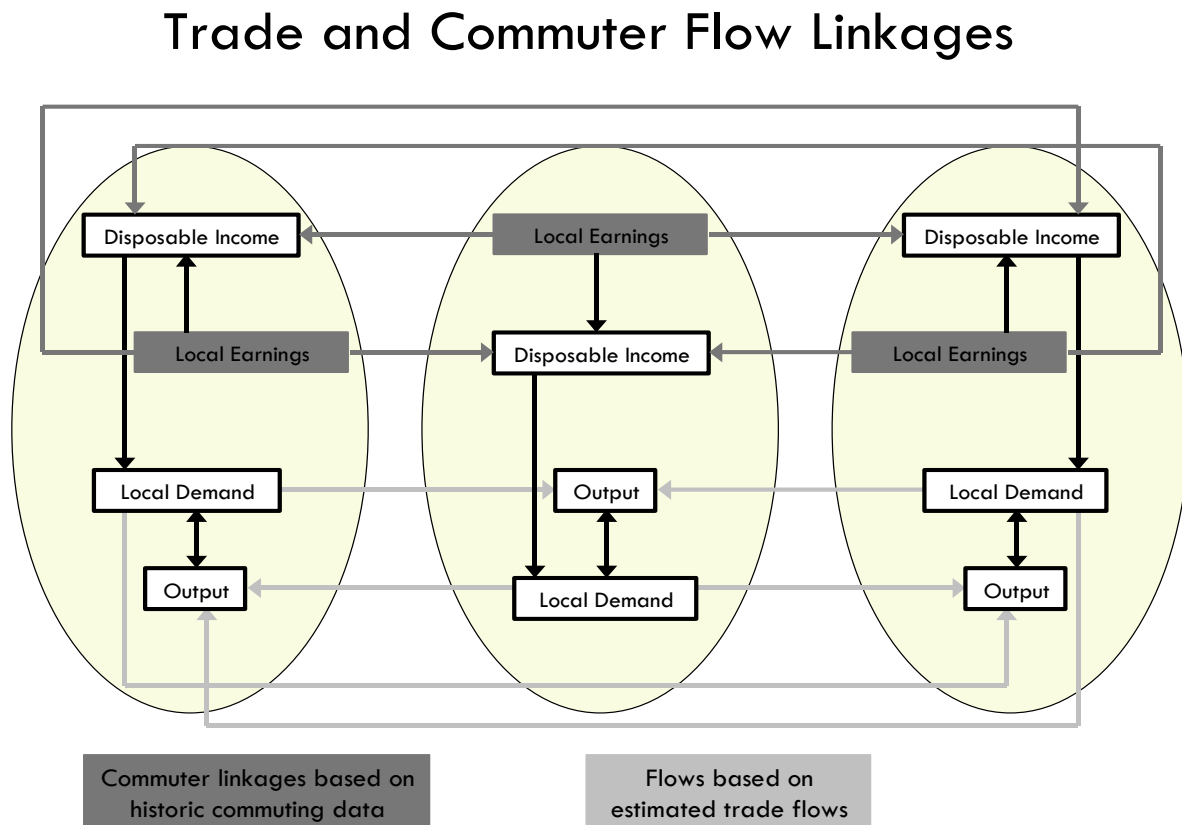
The Output and Demand block consists of output, demand, consumption, investment, government spending, exports, and imports, as well as feedback from output change due to the change in the productivity of intermediate inputs. The Labor and Capital Demand block includes labor intensity and productivity as well as demand for labor and capital. Labor force participation rate and migration equations are in the Population and Labor Supply block. The Compensation, Prices, and Costs block includes composite prices, determinants of production costs, the consumption price deflator, housing prices, and the compensation equations. The proportion of local, inter-regional, and export markets captured by each region is included in the Market Shares block.

Models can be built as single region, multi-region, or multi-region national models. A region is defined broadly as a sub-national area, and could consist of a state, province, county, or city, or any combination of sub-national areas.

Single-region models consist of an individual region, called the home region. The rest of the nation is also represented in the model. However, since the home region is only a small part of the total nation, changes in the home region do not have an endogenous effect on the variables in the rest of the nation.

Multi-regional models have interactions among regions, such as trade and commuting flows. These interactions include trade flows from each region to each of the other regions. These flows are illustrated for a three-region model in Figure 12.

Figure 12: Trade and Commuter Flow Linkages



Multiregional national models also include a central bank monetary response that constrains labor markets. Models that only encompass a relatively small portion of a nation are not endogenously constrained by changes in exchange rates or monetary responses.

Block 1. Output and Demand

This block includes output, demand, consumption, investment, government spending, import, commodity access, and export concepts. Output for each industry in the home region is determined by industry demand in all regions in the nation, the home region's share of each market, and international exports from the region.

For each industry, demand is determined by the amount of output, consumption, investment, and capital demand on that industry. Consumption depends on real disposable income per capita, relative prices, differential income elasticities, and population. Input productivity depends on access to inputs because a larger choice set of inputs means it is more likely that the input with the specific

characteristics required for the job will be found. In the capital stock adjustment process, investment occurs to fill the difference between optimal and actual capital stock for residential, non-residential, and equipment investment. Government spending changes are determined by changes in the population.

Block 2. Labor and Capital Demand

The Labor and Capital Demand block includes the determination of labor productivity, labor intensity, and the optimal capital stocks. Industry-specific labor productivity depends on the availability of workers with differentiated skills for the occupations used in each industry. The occupational labor supply and commuting costs determine firms' access to a specialized labor force.

Labor intensity is determined by the cost of labor relative to the other factor inputs, capital, and fuel. Demand for capital is driven by the optimal capital stock equation for both non-residential capital and equipment. Optimal capital stock for each industry depends on the relative cost of labor and capital, and the employment weighted by capital use for each industry. Employment in private industries is determined by the value added and employment per unit of value added in each industry.

Block 3. Population and Labor Supply

The Population and Labor Supply block includes detailed demographic information about the region. Population data is given for age, gender, and race, with birth and survival rates for each group. The size and labor force participation rate of each group determines the labor supply. These participation rates respond to changes in employment relative to the potential labor force and to changes in the real after-tax compensation rate. Migration includes retirement, military, international, and economic migration. Economic migration is determined by the relative real after-tax compensation rate, relative employment opportunity, and consumer access to variety.

Block 4. Compensation, Prices and Costs

This block includes delivered prices, production costs, equipment cost, the consumption deflator, consumer prices, the price of housing, and the compensation equation. Economic geography concepts account for the productivity and price effects of access to specialized labor, goods, and services.

These prices measure the price of the industry output, considering the access to production locations. This access is important due to the specialization of production that takes place within each industry, and because transportation and transaction costs of distance are significant. Composite prices for each industry are then calculated based on the production costs of supplying regions, the effective distance to these regions, and the index of access to the variety of outputs in the industry relative to the access by other uses of the product.

The cost of production for each industry is determined by the cost of labor, capital, fuel, and intermediate inputs. Labor costs reflect a productivity adjustment to account for access to specialized labor, as well as underlying compensation rates. Capital costs include costs of non-residential structures and equipment, while fuel costs incorporate electricity, natural gas, and residual fuels. The consumption deflator converts industry prices to prices for consumption commodities. For potential migrants, the

consumer price is additionally calculated to include housing prices. Housing prices change from their initial level depending on changes in income and population density.

Compensation changes are due to changes in labor demand and supply conditions and changes in the national compensation rate. Changes in employment opportunities relative to the labor force and occupational demand change determine compensation rates by industry.

Block 5. Market Shares

The market shares equations measure the proportion of local and export markets that are captured by each industry. These depend on relative production costs, the estimated price elasticity of demand, and the effective distance between the home region and each of the other regions. The change in share of a specific area in any region depends on changes in its delivered price and the quantity it produces compared with the same factors for competitors in that market. The share of local and external markets then drives the exports from and imports to the home economy.

Choice of Model and How it Was Built

SEIGMA assesses indirect economic impacts in two ways. The first is by measuring changes in economic indices (e.g., employment, business starts/failures) in secondary data sources (e.g., labor market statistics). The second is by economic modeling, using proprietary programs (i.e., REMI) that model the Massachusetts economy and project the likely impacts of new economic activity after inputting the direct/known casino impacts listed above.

The research team is experienced in building complex economic impact models and has used economic modeling to complete impact analyses and assess the economic contributions of many different types of facilities and industries throughout the state. The SEIGMA team has been using a customized REMI PI+ model of Massachusetts with six sub-state regions that align with existing economic linkages in the Commonwealth. The PI+ model is built using a variety of public sector data series, and is built from county-level data and aggregated to larger regions, as needed. The PI+ software generates realistic year-by-year estimates of the total regional effects of specific initiatives.

We choose the REMI PI+ model for the SEIGMA project because it allows for dynamic, multi-year modeling as compared to other, more simplistic modeling systems (e.g., IMPLAN, RIMS II). REMI thus has significant advantages for major complex initiatives that: a) have time-series based impacts that are likely to vary over time; b) require the use and interpretation of multiple economic variables; and c) emphasize economic interactions between regions within the state that add up to a true state-level impact.

The PI+ model serves to provide two critical elements to assess the economic impacts of casinos. First, the modeling will allow us to estimate how the changes created directly by the casinos and the taxes they generate ripple through the rest of the state economy. Second, the economic impact modeling is the best way to measure the net impact of the casinos after accounting for the reallocation of spending around the state and among industry sectors.

The analysis to estimate the total contribution of the casinos economic activities is built on the basic premise that an initial investment in one sector and region of an economy (i.e., through the operation of a casino) spurs additional economic activity in other sectors and regions as the money is re-spent. The

total economic contribution of the investment is estimated by tracing the flow of money between industries and households until all of the initial investment eventually leaves the region or state through foreign or domestic trade or is collected as a tax.

However, to measure statewide net economic impacts requires a more rigorous analysis that accounts for economic activity that is *net new* to the state versus *re-distributive*. In particular, we will use information from the various patron and population surveys to determine what proportion of visitor expenditures are from out-of-state trips, recaptured trips (money kept in state rather than leaving to be spent elsewhere), and reallocated (money diverted from other uses in the state). This kind of careful accounting—combined with data on the location of casino facility expenditures and the residential location of employees—is necessary to credibly isolate the effects of casino impacts on the broader regional and state economies.

Appendix 4: Glossary for Economic Impacts

In this section, UMDI defines terms common to economic modeling and analysis that are used in this report. They are as follows:

Employment: Employment is a count of jobs, not people, by place of work. It counts all jobs with the same weight regardless of whether the position is full- or part-time or the labor of a self-employed proprietor. Additionally, jobs are counted as job-years, which are equivalent to one job lasting for one year. This is a similar concept to “person-hours.” Jobs often carry over from year to year and therefore the jobs in one year include many of the same jobs as in the previous year. For example, if a new business opens with 10 employees then the host community of that business will have 10 more jobs than it would have had in every future year that the company maintains its workforce. For example, over 5 years, the business will have created 50 job-years (10 jobs at the company x 5 years = 50 job-years) though it is possible that it is not the same 10 people who are working there over time. When reviewing changes in employment across multiple years, knowledge of the concept of job-years is vital to proper interpretation.

Output: Output is the total economic value of production, sales, or business revenues, whether final (i.e., purchased by the end user) or intermediate (used by another business to produce its own output). It includes the value of inputs to production, wages paid to employees, capital expenses, taxes, and profit. It is useful as an indicator of business activity, but it should not be construed as net new economic activity.

Personal Income: Personal income is income and benefits from all sources earned by all persons living in an area. It excludes the income earned by non-resident workers who commute into an area but includes the income of residents who commute out.

Value Added: Value added is the value of all final goods and services created in an economy. It represents new economic activity and is also known as gross product or net economic impact. It differs from output by the value of inputs to production. Value added provides a useful summary of the economy which is why all nations and U.S. states report their economic growth in this way, calling it either gross domestic product or gross state product as appropriate. Its usefulness derives from the elimination of the double-counting inherent in output, which stems from the inclusion of inputs. An example of the double-counting of inputs can be found and simplified in the process of making and selling a loaf of bread. A farmer sells wheat to a mill, which then sells flour to a baker, who then sells bread to the final customer. The sale price of the bread includes the cost of all necessary inputs including growing the wheat, milling the flour, and baking the bread. Value added only counts the sale price of the bread to the final consumer which is the net new value created in the economy. On the other hand, output counts the revenues earned by every business in the supply chain which means that the value of the wheat and flour are counted more than once.

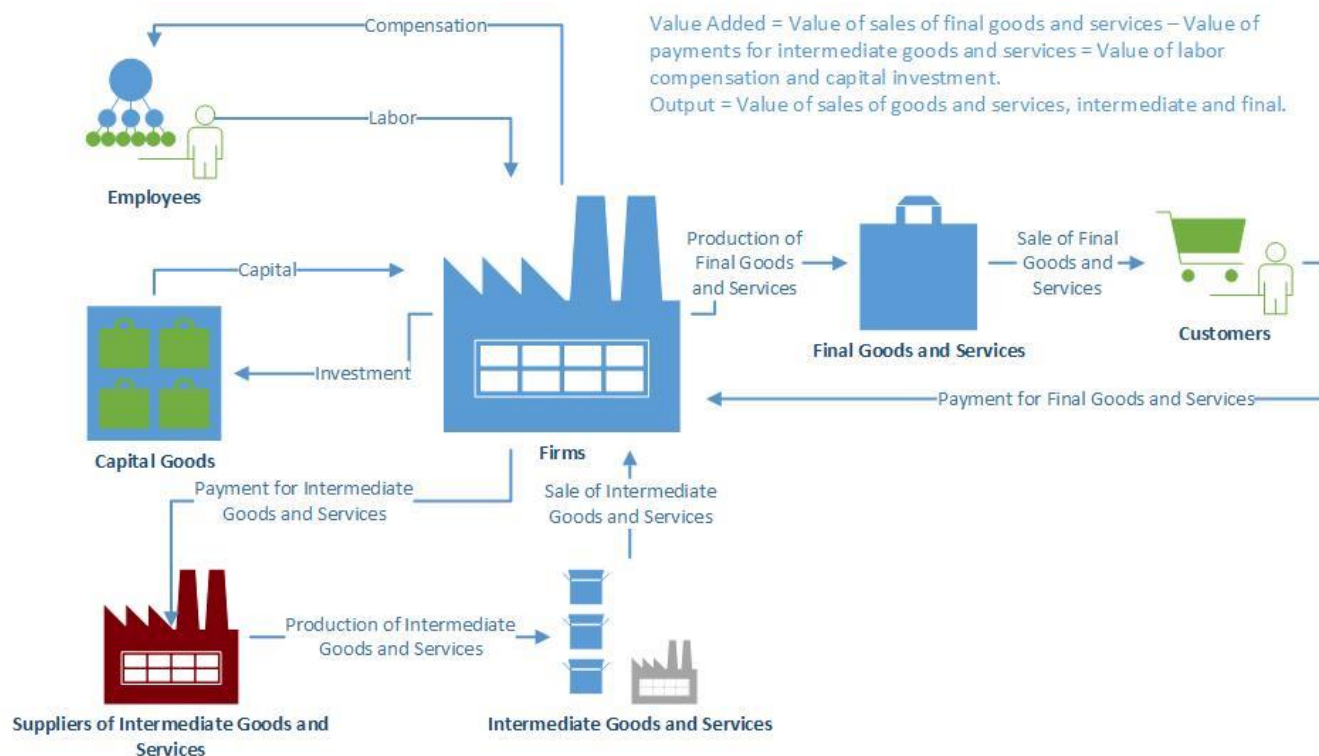
Appendix 5: The Concepts of Output and Value-Added

This appendix serves to clarify the distinctions between two related economic concepts discussed in this report – output and value added.

For any firm to produce goods and services to be sold on the market, it needs to pay for the things required to produce them. It needs to compensate workers for their labor and invest in the capital goods (machinery, for example) which those workers will use. It also needs to purchase intermediate goods and services from other firms. Workers then use the firm's capital goods to turn the intermediate goods and services purchased from other firms into final goods and services. These final goods and services are the output of the firm, and are equivalent to the value of its sales or revenue.

The concept of **value added** captures only the portion of the output which is directly created by the firm's capital goods and labor. In other words, value added is the value of the final goods and services produced minus the cost of the intermediate goods and services which were purchased to produce them. This can be interesting when examining an individual firm, since two firms can have similar outputs but very different value added, depending on the cost of their intermediate inputs.

Figure 13: Output and Value Added

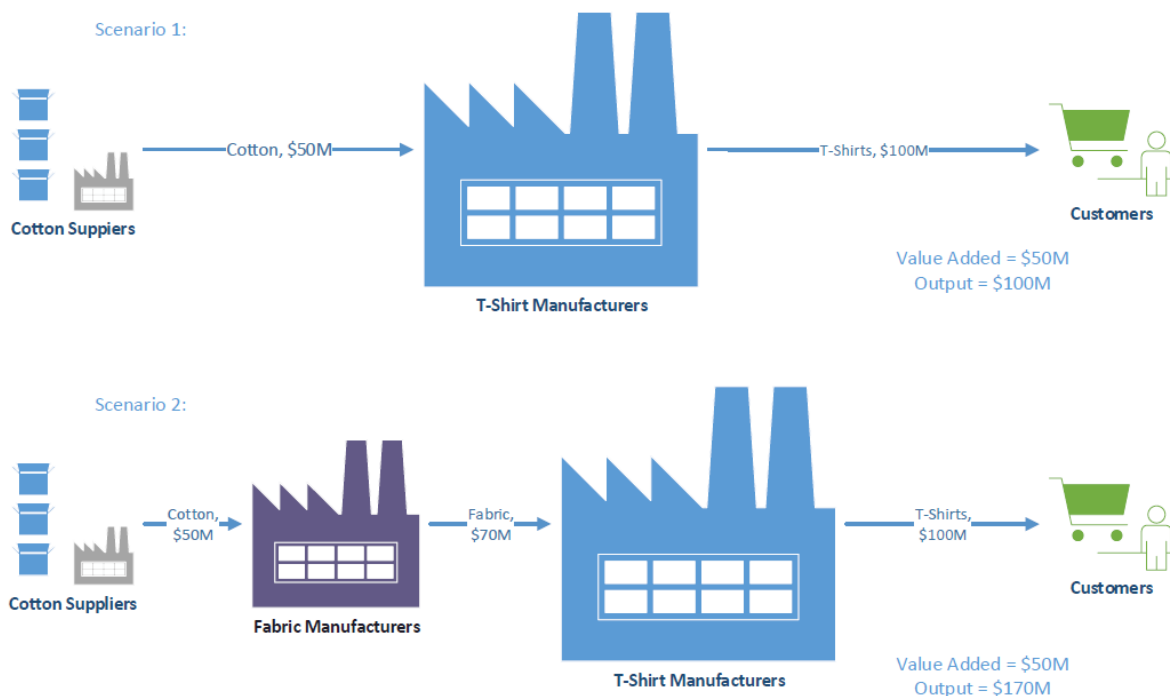


Consider the example of two different t-shirt manufacturers whose economic impact on a region is being evaluated. Both of the manufacturers ultimately sell \$100 million in t-shirts, and in order to produce them, both manufacturers use \$50 million in cotton. However, the structure of their supply

chains is different. One of the firms takes the cotton and performs every step required to turn the cotton into t-shirts at their facility. For this firm, value added is \$50 million (\$100 million in t-shirts minus \$50 million in cotton) and output is \$100 million. The other manufacturer instead opts to purchase fabric from a third-party fabric manufacturer, which has taken the \$50 million in cotton and turned it into \$70 million in fabric. When considering the economic impact of this operation, both firms will need to be considered. The fabric manufacturer has a value added of \$20 million (\$70 million in fabric minus \$50 million in cotton) and an output of \$70 million. The t-shirt manufacturer has a value added of \$30 million (\$100 million in t-shirts minus \$70 million in fabric) and an output of \$100 million, the same as the original factory. Considered together, this second operation has a combined value added of \$50 million, the same as the first example, but a combined output of \$170 million, much higher than the initial example. The lesson from this is that while output is a useful economic metric in many cases, it has the potential to double count the production of some goods and services and is best presented alongside value added for context.

Figure 14: Value Added - Supply Chain Example

Example: How change in supply chains can change output without changing value added



Appendix 6: AirSage

Cell phone location data was employed to shed additional light on the geographic origin of casino patrons to the three Massachusetts casinos. AirSage (<https://airsage.com/>) is a telecommunications company based in Atlanta that began collating GPS data in 2016 and now has more than 5 billion location signals from more than 200 million mobile devices. AirSage collects, curates, and analyzes large volumes of location data to sell to businesses and universities for commercial or research purposes. Target Location Analysis is one AirSage product that provides device counts for a particular point of interest. Visitor information such as home location (county), visitation levels at the location, duration of stay, and estimated demographic profile of visitors can be obtained from this type of location data.

AirSage was contracted to provide cell phone location data for all cell phones detected at the three Massachusetts casinos as well as the eight major casinos within 100 miles of the state border for 14 consecutive days in January 2023 (January 16 – 29) and in October 2023 (October 2 – 15). This provides a fairly comprehensive picture of the casino's actual patronage, as more than 90% of U.S. adults currently carry a smartphone (Pew Research Center, 2024) which typically contains several apps that track location (e.g., Google Maps) (and very few people turn off their cell phones and/or disable all the apps that provide tracking). The eleven casinos selected for the latest study are listed below, along with information pertaining to size and gambling opportunities provided by each casino. In total, there were 1,213,741 cell phones detected in this four-week period (results between the two time periods were added together).

Table 17 Casinos within 100 miles of Massachusetts Border included in the AirSage Analysis

State	Casino	Date First Providing EGMs &/or Table Games	Current Square Footage	Current # EGMs	Current # Table Games	Driving Distance (miles) from MA State Line
MA	Plainridge Park Casino	2015	55,000	1,250	0	0
MA	Springfield MGM	2018	109,000	1,814	102	0
MA	Encore Boston Harbor	2019	210,000	1,800	254	0
RI	Bally's Tiverton Casino	2018	33,000	1,000	32	1
RI	Bally's Twin River Lincoln	1992	162,000	3,900	88	4
CT	Foxwoods Resort Casino	1992	340,000	3,420	265	43
CT	Mohegan Sun	1996	310,000	3,800	308	48
NY	Rivers Casino & Resort Schenectady	2017	50,000	1,150	83	43
NY	Saratoga Casino & Raceway	2004	55,000	1,630	0	53
NY	Empire City at Yonkers Raceway	2006	290,000	5,000	0	94
NY	Resorts World New York City	2011	330,000	6,500	1300	113

The geographic origin of cell phones detected at these venues was used to estimate: (a) the percentage and amount of Massachusetts casino revenue that comes from each state (as well as each Massachusetts county), and (b) the percentage and amount of casino revenue that other states are receiving from Massachusetts residents. This data informs the 'direct economic impacts.'

Note that all cell phones that were detected for 18 days or more during the months of January or October (based on data collection period) were excluded from the patron counts, as these were deemed to most likely be employees of the casino. However, this 18-day cut-off was subsequently determined to be insufficient to effectively exclude most part-time employees, who are estimated to constitute about 36% of all employees (and would represent thousands of individuals for the larger casinos). Thus, a 50% reduction in the counts was made in the 'home county' for all casinos, where the large majority of casino employees reside. The detailed rationale for this additional 'home county' adjustment is below.

Home Casino County Adjustment

AirSage excludes all cell phones that were present 18 or more days during either January 2023 or October 2023 in an attempt to eliminate casino employees from the counts. 18 days is a reasonable exclusionary criterion that should exclude most employees, but not inadvertently exclude most heavy gamblers, as the large majority of full-time employees will likely have worked 20 days or more, and less than one percent of MA and CT casino gamblers report gambling at a casino 4 or more times a week (Gemini Research, 2024; Volberg et al., 2023). Unfortunately, however, **this exclusionary criterion does not effectively exclude part-time casino employees.**

In MA, 32.4% of casino employees are part-time, which is a similar percentage to that found in other jurisdictions. Massachusetts has an average casino employment of 5,128 per pay period. If we assume that 32.4% of these 5,128 employees are part-time (i.e., 1,661) and might have been present an average of 12 days during the 28-day period (vs 20 days for full-time workers), then this would result in 19,932 additional counts that should have been excluded.

Prior research has established that the vast majority of Connecticut casino employees live in the same county at the Foxwood and Mohegan Sun casinos (Gemini Research, 2024). The same pattern has been established in Massachusetts. It is also much more likely for local residents to visit the many restaurants and non-casino amenities that are typically available at these casinos. Thus, it is clear that these additional AirSage counts should be subtracted primarily from the host casino county.

In an effort to correct these local overcounts, a 50% reduction has been made in the host casino(s) county AirSage count. In the case where there are two counties in close proximity to the casino(s), a 25% reduction has been made in each

Appendix 7: Questionnaire for the Massachusetts Gaming Commission

INTRODUCTION

Based on Section 25 of the 2022 Act to Regulate Sports Wagering (House Bill No. 5164), the Massachusetts Gaming Commission is tasked with conducting a study focused on diversity in the sports wagering industry and developing recommendations to ensure diversity, equity and inclusion are included in this method of sports wagering. The Commission has engaged the Donahue Institute, based at the University of Massachusetts, Amherst to carry out this project. The Sports Wagering Diversity Research Services project is tasked with conducting a study on the participation by minority, women, and veteran business enterprises and workers in the sports wagering industry. Our team is conducting key informant interviews with representatives like yourself to obtain recommendations about ensuring and improving employment and vendor diversity.

LOGISTICS

Based on conversations with members of the Massachusetts Gaming Commission (MGC), it was agreed that for the MGC, a questionnaire will be sent, and written responses will be provided by the MGC in lieu of in person interviews. These questionnaires **will not** be confidential as officials/representatives will be participating in their professional capacity and in their area of expertise. Excerpts from the responses may be used in reported findings. However, we will not attribute statements or quotes directly to an individual or organization.

Introduction

1. For all participants answering, can you please share your name, job title, and describe your current work as it relates to the gambling industry?
2. Who are the professionals within your organization that are involved in diversity planning and policies? In what capacities do they work?

Employees

3. How diverse would you say the workforce within your institution is? When thinking about diversity, please include gender, race/ethnicity, and veteran status.
4. What organizational programs, policies and practices are in place related to recruitment of a diverse workforce in your institution, or in the institutions you work with?
5. Can you describe some of the positive and negative outcomes that have come from these programs, practices, and policies?
6. What considerations are there related to employment impact, compensation, benefits, trajectory, and turnover for women, minority, and veteran employees compared to employees from other groups?
7. What workforce training programs are in place to promote the retention and development of a skilled and diverse workforce and to provide access to promotion opportunities?

Business enterprises

8. We are also interested in diversity as it relates to businesses that contract with or provide services to the Massachusetts Gaming Commission, specifically, minority-owned, veteran-owned, and women-owned businesses.
- Which of these types of diverse businesses are most plentiful and engaged in contracting with your institution? What are the factors at play which positively influence the supply of these businesses? What are the factors at play which create challenges to the supply and engagement of these businesses?
 - Are these businesses certified as such? In what business areas are diverse businesses most plentiful and engaged with your institution?
 - What organizational policies and practices are in place related to solicitation of and contracting with minority, women, and veteran business enterprises in the Commonwealth?
 - Can you describe some of the positive and negative outcomes that have come from these programs, practices, and policies?

Evaluation

9. Regarding the employees in your institution, can you please answer the following questions:
- Can you give an assessment about the current levels of engagement and **the barriers** to hiring and employment of women, minorities, and veterans in your institution?
 - What are the main barriers to employment of women, minorities, and veterans in your institution and in state regulatory agencies?
 - In contrast to barriers, what are the main factors that encourage greater diversity in the employment of women, minorities, and veterans in your institution and in state regulatory agencies?
 - Please share some of the challenges / difficulties and some successes you have encountered in the attempts to increase diversity in your institution.
10. Regarding the vendors who work with the Massachusetts Gaming Commission (MGC), please answer the following questions:
- Can you give us an assessment about current levels of engagement and **the barriers** to contracting with diverse business enterprises in the Commonwealth?
 - Please share some of the challenges / difficulties and successes you have encountered in the attempts to increase diversity in terms of vendors who work with the MGC.
11. Regarding the role of the Massachusetts Gaming Commission (MGC) in regulating the sports wagering industry, please answer the following questions:

- a. What is the role of the MGC in fostering diversity among sports books licensees and sports books vendors?
 - b. How is this role different from the MGC's role regulating diversity among casino operators and their vendors?
 - c. What accountability procedures are in place to promote and encourage diversity among sports books employees and vendors?
12. Do you have any documents about your institution's diversity policies and programs which you could share with us? These could be documents about employee or vendor diversity policies.

Recommendations

This section is intended to collect final / definitive thoughts on the most effective policies and recommendations to increase the participation of diverse employees and vendors in state regulatory agencies.

13. Can you define the most critical recommendations as to how to improve diversity, equity, and inclusion in your organization?
14. In what ways can your organization enhance the workforce success of minority, female, and veteran employees?
15. Can you define the most critical policies or approaches to increase the levels of engagement and the volume and scale of business contracting with minority, female, and veteran-owned enterprises in your organization?
16. Do you have additional perspectives and suggestions about designing best programs, policies, and practices to increase racial, gender and veteran diversity in the workforce and among the business enterprises engaged for contracting?

Final Request

17. Is there anyone else you think we should interview or speak with to find out more about diversity in state regulatory agencies? Specifically, can you recommend someone from:
 - a. A diversity owned business, such as a black owned or hispanic owned business.
 - b. A spokesperson from a BIPOC or woman employee affinity group.
 - c. A union representative for employees in state regulatory agencies.

Appendix 8: Operator Questionnaires

Category 1

Sports Betting Impacts

Start of Block: Welcome

Welcome!

At the direction of the Massachusetts Gaming Commission, we are seeking information related to your company's sports betting operation in Massachusetts. If you're receiving this survey, we ask that you answer some questions about employment, vendor spending, diversity efforts, fiscal impacts, and consumer behavior in light of the introduction of retail sports betting at the casino.

The goal of this survey is to obtain information critical for research for the Massachusetts Gaming Commission. The questions are mostly qualitative in nature; a few require numeric estimates. In these cases, we ask that you answer them to the best of your ability, consulting with other staff if necessary. The survey should take between 20 and 30 minutes to complete and contains four parts:

- Payroll and Employment - including Employee Diversity Programs
- Vendor Spending - including Vendor Diversity Programs
- Government Spending
- Patron Behavior

If you have any questions, please reach out to Kassie Breest <kbreest@donahue.umass.edu>

Thank you for your time. We appreciate your help!

Page Break

Q1.3 Please provide your name, title, and email.

☐ Name (1) _____

☐ Title (3) _____

☐ Email (4) _____

Q1.4 Which casino are you affiliated with?

☐ Encore Boston Harbor (1)

☐ MGM Springfield (2)

☐ Plainridge Park Casino (3)

End of Block: Welcome

Start of Block: Part 1: Payroll and Employment

Part 1: Payroll and Employment

Q2.2 Is the payroll information on sports betting-related employees included in the operator dataset that UMDI collects from the casino on a regular basis? In other words, do checks cut for sports betting related employees appear in the casino payroll?

☐ Yes (1)

☐ No (2)

Q2.3 What company is responsible for paying wages for retail sports betting employees at the casino?

Q2.4 How is this company related to the casino operator?

- ☐ Shared parent company/corporate, tethered (1)
- ☐ Unrelated company, tethered (5)
- ☐ Other (please describe the nature of the company below) (6)

Q2.5 Please provide the name and title of the primary contact that you will work with to fulfill the payroll data request (for retail sports betting), similar to the one asked bi-annually of the casinos. This question for informational purposes only.

Q2.6 We will need to clearly distinguish sports betting employees in the payroll data. Please provide the information (such as departments names/codes or occupation titles/codes) that can be used to clearly identify sports wagering operations employees in the payroll data.

End of Block: Part 1: Payroll and Employment

Start of Block: Payroll and Employment: Impacts

Payroll and Employment: Impacts

Q3.2 While we realize that this may be difficult to quantify, please do your best to estimate the impact that the introduction of sports betting has had on operational employment at the casino in the following questions.

Q3.3

To what extent has the casino increased employment or added hours **in other departments** to meet the

demands of sports betting customers? To the best of your ability, estimate the scale to which sports betting customers have increased the need for additional staff hours **in other departments**.

- ☐ Not at all increased (5)
- ☐ Slightly increased (6)
- ☐ Moderately increased (7)
- ☐ Significantly increased (8)

Q3.4

In what ways has the expansion of sports betting impacted employment at the casino in other departments (outside of those directly related to sports betting such as food service or hospitality) to meet additional demand for sports betting?

- ☐ Additional employees hired (1)
- ☐ New administrative or fiscal positions created (2)
- ☐ Hours increased for existing employees (3)
- ☐ Employees reassigned to different/new departments (4)
- ☐ Hours decreased for existing employees (6)
- ☐ Layoffs or terminations (8)
- ☐ No new hiring/no new replacements (9)
- ☐ Other (please specify) (5) _____

Q3.5

Please click and drag a department from the list on the left to a box on the right to reflect employment impacts.

Growing	Shrinking	Unchanged
<input type="text"/> General & Administrative (2)	<input type="text"/> General & Administrative (2)	<input type="text"/> General & Administrative (2)
<input type="text"/> Gaming & Recreation (NOT including sports betting) (3)	<input type="text"/> Gaming & Recreation (NOT including sports betting) (3)	<input type="text"/> Gaming & Recreation (NOT including sports betting) (3)
<input type="text"/> Food & Beverage (4)	<input type="text"/> Food & Beverage (4)	<input type="text"/> Food & Beverage (4)
<input type="text"/> Hotel (5)	<input type="text"/> Hotel (5)	<input type="text"/> Hotel (5)
<input type="text"/> Entertainment (6)	<input type="text"/> Entertainment (6)	<input type="text"/> Entertainment (6)
<input type="text"/> Retail (7)	<input type="text"/> Retail (7)	<input type="text"/> Retail (7)
<input type="text"/> Maintenance & Facilities (8)	<input type="text"/> Maintenance & Facilities (8)	<input type="text"/> Maintenance & Facilities (8)
<input type="text"/> Other (9)	<input type="text"/> Other (9)	<input type="text"/> Other (9)

End of Block: Payroll and Employment: Impacts

Start of Block: Payroll and Employment: Diversity Programs

Employee Diversity Programs

Q4.2 Is the retail sports betting operation at the casino included as a part of casino **employee diversity** programs or initiatives related to minority, female, and veteran employees?

- ☐ Yes (1)
- ☐ No (2)
- ☐ I don't know (3)

Q4.3

What kinds of organizational policies and practices are in place related to **recruitment of a diverse workforce**? Please describe the major policies and practices.

Q4.4

What kinds of **special considerations** are there related to compensation, benefits, career trajectory, and turnover for minority, women, and veteran employees compared to employees in other groups? Please describe the major policies and practices.

Q4.5

What kinds of **workforce training programs** are in place to promote the retention and development of a skilled and diverse workforce **and** to provide access to promotion opportunities? Please describe the major policies and practices.

Q4.6 Please provide the name, title, and email of a contact who can provide information on employee diversity policies and practices if necessary.

☐ Name (1) _____

☐ Title (2) _____

☐ Email (3) _____

End of Block: Payroll and Employment: Diversity Programs

Start of Block: Part 2: Vendor Spending (business-to-business)

Part 2: Vendor (business-to-business) Spending

Q5.2 Are the purchases of goods and services related to retail sports betting included in the regular operator dataset that UMDI collects from the casino on a regular basis? In other words, do the businesses that the casino solicits for retail sports betting goods or services appear in the casino's business-to-business spending data?

☐ Yes (1)

☐ No (2)

Q5.3 What company is responsible for maintaining vendor spending data related to retail sports betting operations at the casino?

Q5.4 How is this company related to the casino operator?

☐ Parent company/corporate (1)

☐ Tethered operator (2)

☐ Some combination of the two (3)

☐ Other (please describe the nature of the company below) (4)

Q5.5 Please provide the name and title of the primary contact that you will work with to fulfill the vendor spending data request (for retail sports betting), similar to the one asked bi-annually of the casinos. This question for informational purposes only.

Page Break

We will need to clearly distinguish sports betting related vendors IF those vendors appear in the regular, casino vendor spending data.

Q5.7 Please identify any businesses that provide advertising, marketing, or promotional services **exclusively or primarily to the retail sports betting** part of your operation IF those businesses appear in your casino vendor spending data. (List name(s) of business(es))

Q5.8 Please identify any other vendors that provide goods and services **exclusively or primarily to the retail sports betting** part of your operation IF those vendors appear in your casino vendor spending data. (List name(s) of business(es))

End of Block: Part 2: Vendor Spending (business-to-business)

Start of Block: Vendor Spending: Impacts

Vendor (business-to-business) Spending: Impacts

Q6.2 Are there any departments outside of sports betting within the casino operation where spending has **increased** to accommodate an increase in patronage (e.g. food and beverage service) or employees (e.g. uniforms) due to sports betting?

- ☐ Yes (1)
- ☐ No (2)
- ☐ I don't know (3)

Q6.3 Please list departments of the casino operation where spending has increased

Q6.4 To what extent has spending **increased** across these departments? To the best of your ability, estimate the scale to which spending has **increased** overall.

- ☐ Not at all increased (1)
- ☐ Slightly increased (2)
- ☐ Moderately increased (3)
- ☐ Significantly increased (4)

Q6.5 Are there any departments within the casino operation where spending has **decreased** as a result of changes in patron spending or because those costs are now covered by an outside operator?

- ☐ Yes (1)
- ☐ No (2)
- ☐ I don't know (3)

Q6.6 Please list areas of the casino operation where spending has **decreased**

Q6.7 To what extend has spending **decreased** across these departments? To the best of your ability, estimate the scale to which spending has **decreased** overall.

- ☐ Not at all decreased (1)
- ☐ Slightly decreased (2)
- ☐ Moderately decreased (3)
- ☐ Significantly decreased (4)

Q6.8 Did the casino hire any outside vendors/personnel to facilitate the integration of the sports betting operation? (e.g. construction/architecture firms to manage renovations or legal, consulting, or advertising/marketing/promotional services)

- ☐ Yes (1)
- ☐ No (2)
- ☐ I don't know (3)

End of Block: Vendor Spending: Impacts

Start of Block: Vendor Spending: Diversity Programs

Vendor Diversity Programs

Q7.2 Is the retail sports betting operation at the casino included as a part of casino **vendor diversity** programs or initiatives to promote and increase contracting with minority-, woman-, and veteran-owned businesses?

- ☐ Yes (1)
- ☐ No (4)
- ☐ I don't know (5)

Q7.3 What kinds of organizational policies and practices are in place related to **solicitation of and increasing the number of contracts** with minority-, woman-, and veteran-owned enterprises located in the Commonwealth? Please describe the major policies and practices.

Q7.4 What kinds of organizational policies and practices are in place related to **increasing the size** (dollar value) of contracts with minority-, woman-, and veteran-owned enterprises located in the Commonwealth? Please describe the major policies and practices.

Q82 Please provide the name, title, and email of a contact who can provide information on vendor diversity policies and practices if necessary.

☐ Name (1) _____

☐ Title (2) _____

☐ Email (3) _____

End of Block: Vendor Spending: Diversity Programs

Start of Block: Part 3: Government Spending

Part 3: Government Spending

Q8.2 Are there any one-time or recurring payments to state or local government entities in Massachusetts, other than the assessment on gross gaming revenue, that are directly related to the expansion of retail sports betting? Choose all that apply.

☐ Yes, paid by casino. (1)

☐ Yes, paid by tethered operator. (5)

☐ No (2)

☐ I don't know (4)

Q8.3 Please list the Massachusetts state or local government entities **and** type of payment that the casino paid/pays directly related to the expansion of retail sports betting.

Q8.4 Do these government payments related to sports betting appear in the regular vendor spending dataset that UMDI collects from the casino on a regular basis, as requested?

- ☐ Yes (1)
- ☐ No (2)
- ☐ I don't know (3)

Q8.5 Will these government payments related to sports betting appear in the vendor spending dataset that UMDI will collect from the tethered operator on a regular basis, as requested?

- ☐ Yes (1)
- ☐ No (2)
- ☐ I don't know (3)

Q8.6 To the best of your ability, please estimate the **total annual dollar amount** of any sports betting-related payments made to state or local government entities in Massachusetts (other than the assessment on gross gaming revenue) that are **not** included in the vendor data.

End of Block: Part 3: Government Spending

Start of Block: Part 4: Patron Behavior

Part 4: Patron Behavior

Q9.2 To the best of your ability, please estimate the breakdown in patronage between the following groups of retail sports betting patrons. Input a number in the box that corresponds to each group of patrons totaling to 100.

New patrons, those who did not previously visit the casino, but now do : _____ (1)

Existing casino patrons, those who have increased their gambling spending to include retail sports betting : _____ (2)

Existing casino patrons, who have shifted their casino spending away from other gambling activities and to retail sports betting : _____ (3)

Other, not specified above : _____ (4)

Total : _____

Category 3

Sports Betting Impacts - Online/Mobile Operators

Welcome!

Sports betting has been expanding across many U.S. states. Our team at the UMass Donahue Institute (UMDI) leads the Massachusetts Gaming Commission (MGC) research agenda aimed at understanding the social and economic impacts of gambling in Massachusetts. Our current research projects include a study of the early impacts of sports wagering and a study examining diversity within the industry.

We are using this questionnaire to gather data to answer research questions in studies for the MGC. The answers will help us gain a better understanding of what moving into a new state means for Category 3 sports betting licensees. We want to understand how (if at all) your organization increases your economic activity (new hiring or spending) in the course of doing business in a new state. In addition to these economic questions, we also want to get a general idea of your business' approach to diversity in hiring and in spending on outside firms. We plan to report the data in the most aggregated way possible which still allows us to answer the required research questions. We will report observed trends in responses (e.g. "X percent of operators indicated"). Results may be reported using categories such as 'all mobile operators,' 'in-state headquarters,' 'out-of-state headquarters,' etc. Operators will also have the opportunity to review our work prior to its release and provide feedback.

We ask that you answer these questions to the best of your ability, consulting with other staff if necessary. The survey should take between 10 and 20 minutes to complete.

If you have any questions, please reach out to Tom Peake <tpeake@donahue.umass.edu>

Thank you for your time. We appreciate your help!

Page Break

Q0.1 Please provide your name, title, and email.

☐ Name (1) _____

☐ Title (3) _____

☐ Email (4) _____

Q0.2 Which online/mobile sports betting operator are you affiliated with?

☐ Bally Bet (2)

☐ BetMGM (3)

☐ Caesar's Sportsbook (5)

☐ DraftKings (6)

☐ ESPN Bet (7)

☐ Fanatics (8)

☐ FanDuel (9)

End of Block: Welcome

Start of Block: Part 1: Economic Activity - Operating in a New State

Part 1: Economic Activity: Operating in a New State

The questions in this section are focused on how your economic activity changes when you move into **any new state**.

Q1.1 When a new state legalizes gambling, what are the strategic factors that inform whether your organization will operate in that state, if any? In other words, what factors influence your organization's decision to operate in a particular state?

Q1.2 When your organization chooses to operate in a new state, is that decision generally accompanied by any additional **hiring** within your organization?

☐ Yes (1)

☐ No (2)

Q1.3 What departments or occupations tend to see increased hiring in response to your organization operating in a new state? For example, does the choice to move into a new market generally prompt your organization to hire additional marketing, customer support, or legal staff?

Q1.4 Are there any types of workers who you tend to hire within a state when your organization chooses to begin operating in that state?

Q1.5 Are there any staff in your organization who are assigned a portfolio of work which is specific to a particular state? For example, are there employees who specifically focus on customers or other stakeholders in a particular state?

Q1.6 When your organization chooses to operate in a new state, is that decision generally accompanied by additional **spending** to other firms?

☐ Yes (1)

☐ No (2)

Q1.7 What sorts of goods, services, or firms does your company tend to purchase or hire in the course of moving into a new state? For example, does the labor involved with moving into a new state require your organization to spend additional money on vendors, consultants, lawyers, or advertisers?

Q1.8 Are there any types of firms that you tend to hire within a state (in-state vendors) when your organization chooses to begin operating within that state? Please list the types.

End of Block: Part 1: Economic Activity - Operating in a New State

Start of Block: Part 2: Economic Activity - Operating in Massachusetts

Part 2: Economic Activity: Operating in Massachusetts

The previous questions were focused on how your economic activity changes when you move into *any* new state. Next, we want to specifically ask about your organization's choice to move into **Massachusetts**.

Q2.2 What factors led you to make the decision to begin doing business in Massachusetts specifically?

Q2.3 Did your organization hire any additional staff specifically as a result of Massachusetts opting to legalize sports betting?

☐ Yes (4)

☐ No (5)

Q2.4 Do any of those employees work in jobs that require them to live or perform their work in Massachusetts? In other words, do you have any employees who live or work in Massachusetts, and who would not be able to perform their tasks remotely or in an out-of-state office? If yes, please describe.

Q2.5 Did your organization spend any new money on goods and/or services from other firms (such as vendors of IT products, consultants, lawyers, advertisers, etc.) specifically as a result of Massachusetts opting to legalize sports betting?

☐ Yes (4)

☐ No (5)

Q2.6 In the course of expanding into Massachusetts, did your organization purchase any of these goods and/or services from firms located in Massachusetts?

☐ Yes (1)

☐ No (2)

Q2.7 Did any of these firms perform work that requires them to be located in Massachusetts? If yes, please describe.

End of Block: Part 2: Economic Activity - Operating in Massachusetts

Start of Block: Part 3: Diversity Policies

Part 3: Diversity Policies

Q3.1 Does your organization have any specific policies or practices related to diversity and inclusion in *hiring*? Please describe.

Q3.2 Does your organization have any specific policies or practices related to diversity and inclusion in *employee retention*? Please describe.

Q3.3 Does your organization have any specific policies or practices related to spending on or contracting with diverse vendors/outside firms (i.e. minority-, women-, and veteran-owned firms)? Please describe.

Q3.4 Is there anything else you would like to share with us around your organization's approach towards diversity?

Q3.5 Please provide the name, title, and email of a contact who can provide information on diversity policies and practices if necessary.

☐ Name (1) _____

☐ Title (2) _____

☐ Email (3) _____

End of Block: Part 3: Diversity Policies

Start of Block: Part 4: General Operational Spending

Q4.1 Spending to Outside Vendors

To the best of your ability, please drag and drop each business sector into the box which indicates the relative level of spending to outside vendors by your organization each year (High, Medium, Low or None).

High	Medium	Low	None
_____ Utilities Electric; Water (1)	_____ Utilities Electric; Water (1)	_____ Utilities Electric; Water (1)	_____ Utilities Electric; Water (1)
_____ Wholesalers Durable Goods - Computers, Electronics, Technical Equipment and Infrastructure; Other Equipment (4)	_____ Wholesalers Durable Goods - Computers, Electronics, Technical Equipment and Infrastructure; Other Equipment (4)	_____ Wholesalers Durable Goods - Computers, Electronics, Technical Equipment and Infrastructure; Other Equipment (4)	_____ Wholesalers Durable Goods - Computers, Electronics, Technical Equipment and Infrastructure; Other Equipment (4)
_____ Transportation and Warehousing Couriers and Messengers; Warehousing and Storage (6)	_____ Transportation and Warehousing Couriers and Messengers; Warehousing and Storage (6)	_____ Transportation and Warehousing Couriers and Messengers; Warehousing and Storage (6)	_____ Transportation and Warehousing Couriers and Messengers; Warehousing and Storage (6)
_____ Information Services Software Publishers; Telecommunications; Data Processing Hosting and Related Services; Other (8)	_____ Information Services Software Publishers; Telecommunications; Data Processing Hosting and Related Services; Other (8)	_____ Information Services Software Publishers; Telecommunications; Data Processing Hosting and Related Services; Other (8)	_____ Information Services Software Publishers; Telecommunications; Data Processing Hosting and Related Services; Other (8)
_____ Finance and Insurance Insurance Carriers and Related	_____ Finance and Insurance Insurance Carriers and Related	_____ Finance and Insurance Insurance Carriers and Related	_____ Finance and Insurance Insurance Carriers and Related

Activities Funds, Trusts,
and Other Financial
Vehicles and Services (2)

_____ **Real Estate,
Rental, and Leasing** Real
Estate Purchases Rentals
and Leases (9)

_____ **Professional,
Scientific, and Technical
Services** Consulting
Services Research and
Development Services;
Legal Services;
Accounting and Payroll
Services; Specialized
Design Services;
Computer Systems
Design Services;
Advertising and
Marketing Services (10)

_____ **Administrative
and Support Services**
Employment Services
(including Temp
Agencies); Travel
Arrangement and
Reservation Services;
Investigation and Security
Services; Services to
Buildings and Dwellings;
Other Support Services
(3)

_____ **Other Business
Sectors** Construction;
Manufacturing;
Retailers; Educational
Services; Health Care and
Social Assistance; Arts,
Entertainment, and
Recreation;
Accommodation and
Food Services; Etc. (11)

Activities Funds, Trusts,
and Other Financial
Vehicles and Services (2)

_____ **Real Estate,
Rental, and Leasing** Real
Estate Purchases Rentals
and Leases (9)

_____ **Professional,
Scientific, and Technical
Services** Consulting
Services Research and
Development Services;
Legal Services
Accounting and Payroll
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Design Services;
Computer Systems
Design Services;
Advertising and
Marketing Services (10)

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and Support Services**
Employment Services
(including Temp
Agencies); Travel
Arrangement and
Reservation Services;
Investigation and Security
Services; Services to
Buildings and Dwellings;
Other Support Services
(3)

_____ **Other Business
Sectors** Construction;
Manufacturing Retailers;
Educational Services;
Health Care and Social
Assistance; Arts,
Entertainment, and
Recreation;
Accommodation and
Food Services; Etc. (11)

Activities Funds, Trusts,
and Other Financial
Vehicles and Services (2)

_____ **Real Estate,
Rental, and Leasing** Real
Estate Purchases Rentals
and Leases (9)

_____ **Professional,
Scientific, and Technical
Services** Consulting
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(3)

_____ **Other Business
Sectors** Construction;
Manufacturing;
Retailers; Educational
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Social Assistance; Arts,
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Recreation;
Accommodation and
Food Services; Etc. (11)

Activities Funds, Trusts,
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_____ **Real Estate,
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Services; Services to
Buildings and Dwellings;
Other Support Services
(3)

_____ **Other Business
Sectors** Construction;
Manufacturing;
Retailers; Educational
Services; Health Care and
Social Assistance; Arts,
Entertainment, and
Recreation;
Accommodation and
Food Services; Etc. (11)

End of Block: Part 4: General Operational Spending

Economic Impacts of Sports Betting 2023

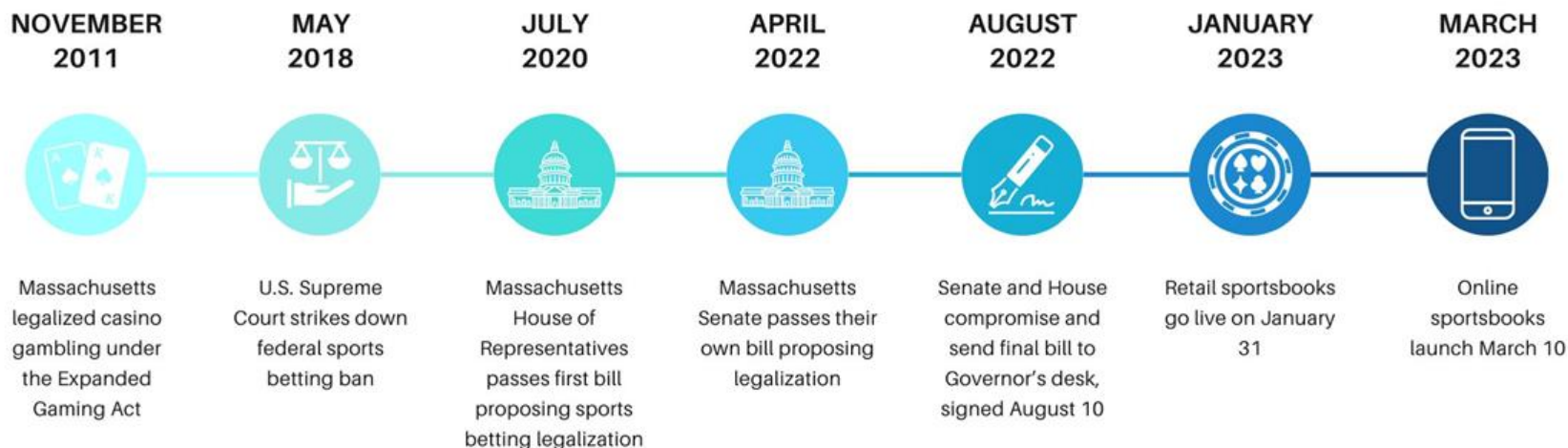
Thomas Peake, Research Manager
Economic and Public Policy Research
UMass Donahue Institute

July 31, 2025

What is this research about?

- This report was prepared as part of the Social and Economic Impacts of Gambling in Massachusetts (SEIGMA) project in order to catalog the ways in which the Massachusetts economy has been changed by the legalization of sports betting.
- Legalization introduced three retail sports betting operators, operating within the three existing casino locations, and nine mobile or online sports betting operators (six of which operated through 2023) into the Commonwealth's gambling industry.
- This study covers 2023, the first year of sports betting legalization.

Sports Betting Legalization in Massachusetts



Operator License Types

Mass. General Laws c.23N created three different license categories based on the type of operator

Category 1

for licensed casinos to offer in-person sports wagering

Encore Boston Harbor

MGM Springfield

Plainridge Park Casino

Category 2

for certain racetracks and/or simulcast centers to offer in-person sports wagering

No licensees

Category 3

for online/mobile operators to offer online sports wagering

BetMGM

Caesars Sportsbook

Fanatics Betting & Gaming

ESPN Bet

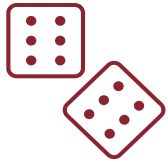
DraftKings

FanDuel

Betr

WynnBet

Economic Impact Modeling - Three Key Sources of Data



Casino and mobile sports betting operations

- Quantitative and qualitative first party spending data on vendors, employees and government entities



Gross gaming revenues

- Publicly available through the MGC



Patron spending behavior

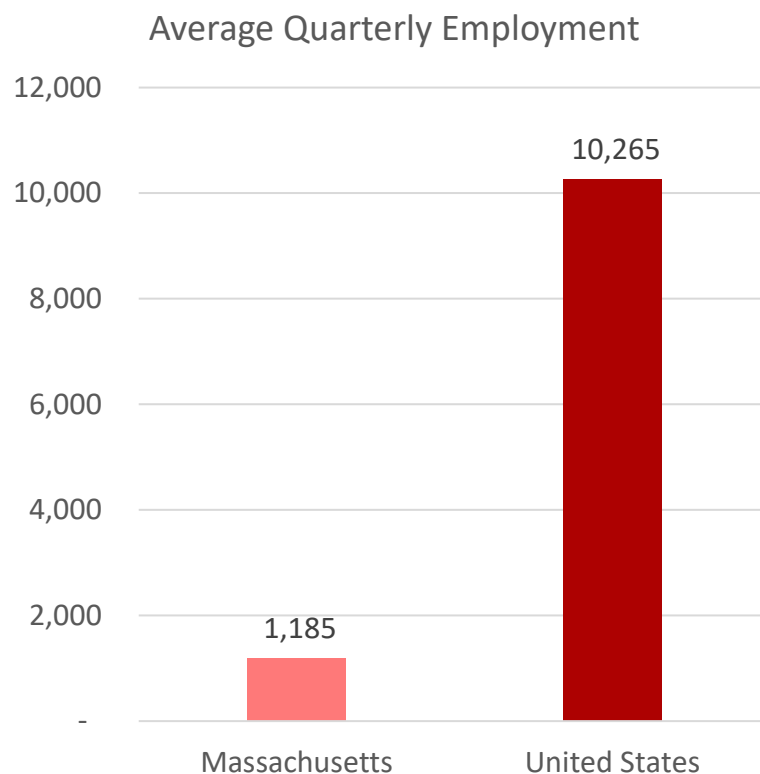
- Online panel survey (OPS) conducted by the SEIGMA team

Sports Betting Requires New Modeling Strategies

- Though the economic impacts of the casino industry have been modeled thoroughly in the past, the sports betting industry is different from the casino industry in almost every way.
- The economic activities these operators engage in, and the degree to which they engage in these activities in Massachusetts, differs from casino operators.
- As such, new methods were developed, and the data used to understand these impacts are different.

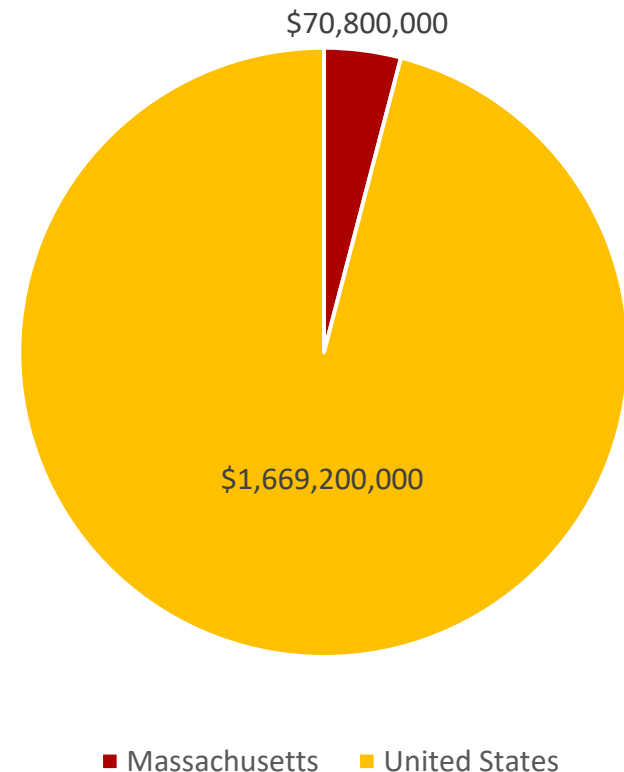
Key Finding: Mobile Sports Betting Companies do not Require the Same In-State Presence as Casinos

- As a technology-based activity, mobile sports betting does not require nearly the same levels of hiring to operate that the casinos required when they opened. It is also less important that those jobs be physically located in Massachusetts.
- Nearly twelve percent of those employees were employed in Massachusetts. However, most of that employment existed in Massachusetts prior to the legalization of sports betting and was not a direct result of expansion to the state.

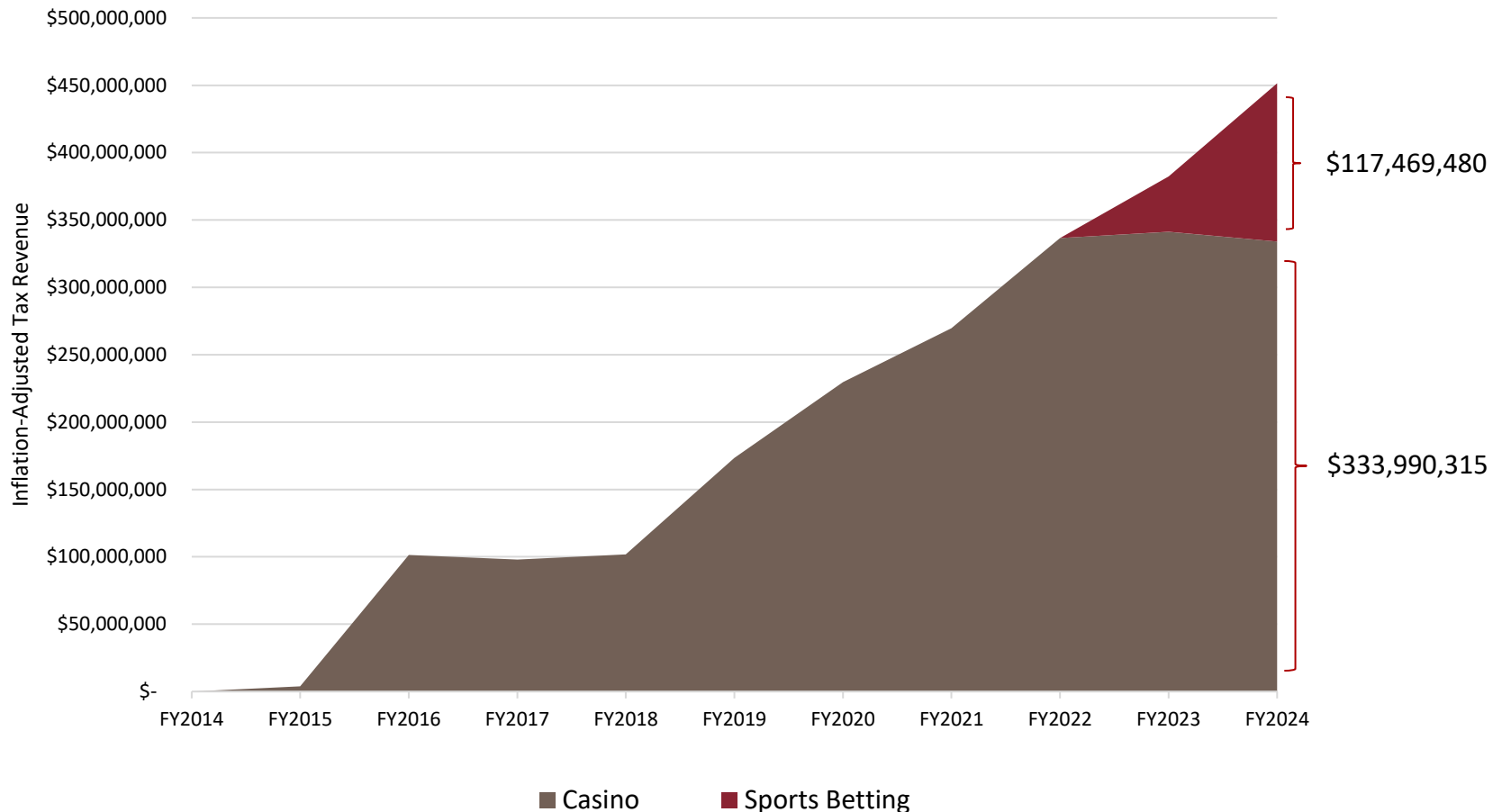


Key Finding: Sports Betting Vendor Spending is Concentrated in White Collar Industries

- Category 3 operators made a total of \$1.74 billion in payments to vendors across the state and nation in 2023.
- About four percent of those payments, \$70.8 million, were made to Massachusetts firms.
- As a result of initiating operations in Massachusetts, sports betting operators reported spending needs in several key sectors, including setting up and maintaining data centers in a new location; new spending on marketing, advertising, and promotions; and new spending on professional technical services related to legal and regulatory requirements.

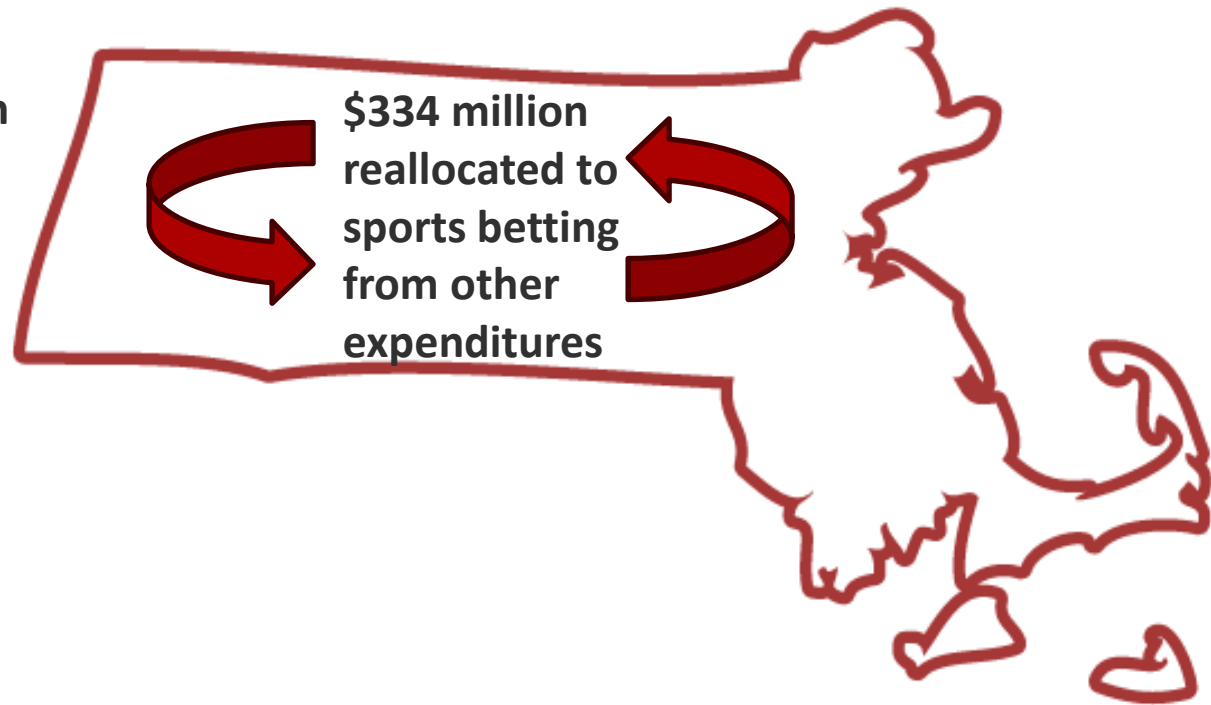


Key Finding: Sports Betting is Growing Quickly, but may be Eating into Casino Revenue

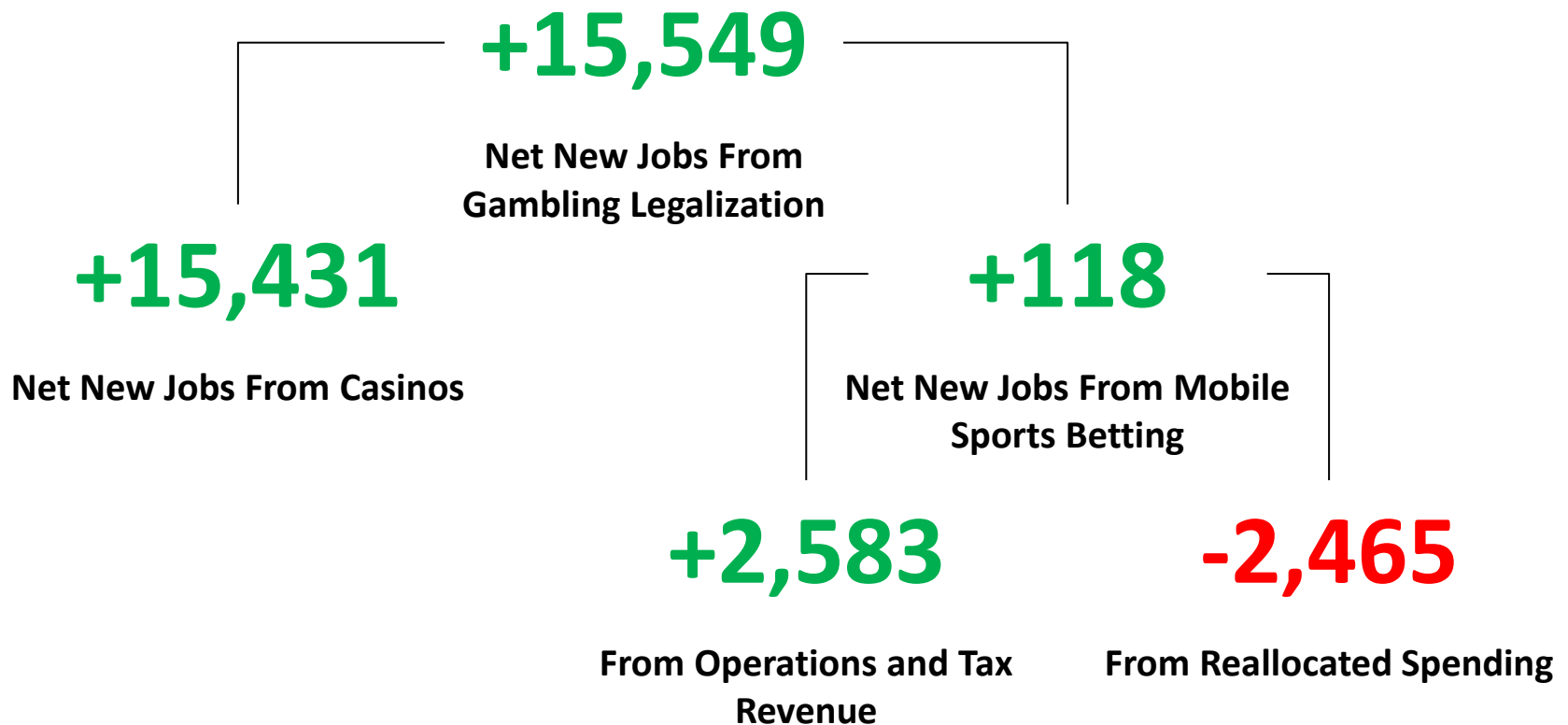


Key Finding: The Majority of Sports Betting Spending Was Reallocated from other Massachusetts Businesses

\$137 million
recaptured from
out of state and
grey markets



Key Finding: Job Growth from Legalized Gambling is Dependent on Casinos



Key Finding: Almost All of Legalized Gambling's Economic Output is Produced by Casinos

- Legalized gambling as a whole supports almost \$3.6 billion in Output (sales), with \$2.5 billion of that being Value Added (gross state product).
- Only 2 percent of Output from legalized gambling is generated by mobile sports betting.
 - Mobile sports betting's relatively small share is likely a result of its limited in-state vendor spending and limited direct employment.
- The small positive impact on the economy is largely due to the tax revenue it generates for the Commonwealth, and the subsequent expenditure of those funds

Conclusion

- The results of this economic modeling analysis indicate that the net economic impact of sports betting is slightly positive, but it is important to note that these results do not account for social impacts that may have “downstream” social and economic impacts, such as bankruptcies and should be viewed with some degree of caution.

Thank You!

Economic and Fiscal Research Team

MGC Research Snapshot

Current Trends in Gambling, Sports Betting and Problem Gambling in Massachusetts, 2022-2024

June 2025

What you need to know

This report assesses changes in gambling attitudes, gambling participation, and problem gambling prevalence among monthly gamblers in the four most recent online panels in Massachusetts, carried out between 2022 and 2024. There was a rise in participation in most gambling activities from 2022 to 2023 followed by declines in Spring 2024 with no significant changes in Fall 2024. There were rises in problem gambling prevalence among monthly gamblers, as well as a rise in family and relationship harms. Given rising rates of sports betting frequency, education and harm reduction strategies targeting sports bettors are warranted. There is a need for an expansion of responsible gambling tools to support individuals reporting financial harms and/or family or relationship harms.

What is this research about?

Population surveys of gambling participation and gambling problems have become increasingly expensive and complex over time. An emerging option to improve surveillance is the use of annual online panel surveys to supplement less frequent population surveys. Online panels consist of groups of people recruited to participate in online surveys in return for compensation. While online panels are not representative of the population, individuals who participate in such surveys tend to be heavy gamblers which provides a much greater 'yield' of individuals with characteristics of the greatest concern to policymakers, regulators, and others seeking to minimize and mitigate gambling harm.

This report assesses changes in gambling attitudes, gambling participation and problem gambling prevalence among monthly gamblers in the four most recent online panels in Massachusetts, carried out between 2022 and 2024. While online panels cannot be used to estimate population prevalence rates, it is reasonable to assume that changes in the behavior of monthly gamblers in the online panels do reflect changes in how heavy gamblers in the population are behaving. This report is the second in a series of reports tracking gambling attitudes, participation and problem gambling prevalence in Massachusetts at regular intervals.

What did the researchers do?

Five online panel surveys have been carried out in Massachusetts as part of the SEIGMA study. The Baseline Online Panel Survey (BOPS) was fielded in 2013 and 2014; the Follow-up Online Panel Survey (FOPS) was fielded in March 2022; the 2023 Online Panel Survey (OPS23) was fielded one year later in March 2023; and two online panel surveys were fielded in the Spring and Fall of 2024. The goal of the online surveys was not to

generate estimates of behaviors in the population but instead to track changes in behavior over time among monthly or more frequent gamblers. It is important to emphasize that the researchers did not conduct a longitudinal study of the same people over time; instead, surveys were completed by different groups of people at each point in time.

What did the researchers find?

This report includes results for monthly gamblers in the online panel surveys. Researchers use the terms "among monthly gamblers in the online panels" and "among monthly gamblers" but this always refers only to panel members and not to the population of Massachusetts.

Attitudes Toward Gambling

- Rise in proportion of monthly gamblers in the online panels who believe that the harm of gambling outweighs the benefits from 2022 to 2024;
- Decline in proportion of monthly gamblers who believe that all types of gambling should be legal between 2022 and 2023;
- Rise in proportion of monthly gamblers who believe that gambling in Massachusetts is too widely available between 2022 and 2023.

Gambling Behavior

- Rising participation in most gambling activities from 2022 to 2023 followed by declines in Spring 2024 with no significant changes in Fall 2024;
- No significant change in participation in traditional large jackpot lottery games between 2022 and 2024;
- Decline in participation in instant lottery games between 2023 and Spring 2024;



- Rising gambling intensity (number of types of gambling, number of days gambled) among monthly gamblers between 2022 and 2023;
- Rising rates of monthly and weekly betting on sports among monthly gamblers from 2022 to 2023 with rates maintained in 2024;
- Declines in the rate of social sports betting among monthly gamblers and rising sports betting with legal land-based sportsbooks in Massachusetts and with online sportsbooks in Massachusetts between 2022 and 2023 with rates maintained in 2024;
- Some recapture of illegal sports betting expenditures in Massachusetts among monthly gamblers between 2022 and 2024.

Gambling Problems and Harms

- Rise in problem gambling prevalence among monthly gamblers in the online panels between 2022 and 2023 with the rate maintained in 2024;
- Rise in family and relationship harms between 2022 and 2023 with another rise in Spring 2024 that was maintained in Fall 2024.

Conclusions and Recommendations

- Given rising rates of sports betting frequency, education and harm reduction strategies targeting sports bettors are warranted.
- There is a need to expand responsible gambling tools to support individuals reporting financial harms and/or family or relationship harms.

About the researchers

Rachel A. Volberg, Valerie Evans, and Parastoo Dezyani are part of the SEIGMA team at the School of Public Health and Health Sciences, University of Massachusetts Amherst. Robert J. Williams is the Co-Principal Investigator on the SEIGMA project and is with the Faculty of Health Sciences at the University of Lethbridge in Alberta, Canada. For more information about this study, please contact Rachel Volberg at rvolberg@schoolph.umass.edu.

Citation

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<https://massgaming.com/about/research-agenda-search/?cat=social-impact>

Key Words

Social Impact; Problem Gambling; Online Panel Surveys

Acknowledgments

Financial support for this study comes from the Massachusetts Gaming Commission through the Public Health Trust Fund.

About this Snapshot

MGC Snapshots are intended to translate lengthy and sometimes technical reports into an easily understandable overview of the research. The findings and recommendations in the Snapshot are those of the researchers and do not necessarily reflect the position of the MGC.



Current Trends in Gambling, Sports Betting and Problem Gambling in Massachusetts, 2022-2024



June 10, 2025



SOCIAL AND ECONOMIC IMPACTS
OF GAMBLING IN MASSACHUSETTS

UNIVERSITY OF MASSACHUSETTS SCHOOL OF PUBLIC HEALTH AND HEALTH SCIENCES

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Authorship and Acknowledgements

Authorship

Rachel A. Volberg, Research Professor at the School of Public Health and Health Sciences, University of Massachusetts Amherst and Principal Investigator on the SEIGMA project. Dr. Volberg is the lead author of this report.

Valerie Evans, SEIGMA Project Manager and Biostatistician, School of Public Health and Health Sciences, University of Massachusetts Amherst. Ms. Evans provided background research on the topic and reviewed the draft report.

Parastoo Dezyani, doctoral student in the School of Public Health and Health Sciences at the University of Massachusetts, was responsible for data cleaning, data management, and data analysis and the production and checks of all tables and figures.

Robert J. Williams, Professor in the Faculty of Health Sciences at the University of Lethbridge in Alberta, Canada, and Co-Principal Investigator on the SEIGMA project. Dr. Williams contributed to all sections of the report.

Acknowledgements

Financial support for the Social and Economic Impacts of Gambling in Massachusetts (SEIGMA) study comes from the Massachusetts Gaming Commission. This multi-year project was competitively bid and awarded to the University of Massachusetts Amherst in April 2013. In June 2019, the Massachusetts Gaming Commission issued a subsequent Request for Response (BD-19-1068-1700-1-40973) for Research Services and the University of Massachusetts Amherst was awarded the contract effective January 2020.

We would like to thank the members of the Massachusetts Gaming Commission's Research Review Committee (RRC). Members of this committee represent a range of perspectives and their careful review of draft versions of this report contributed to its clarity as well as utility to multiple audiences.

As always, we thank the Massachusetts Gaming Commission for their continued vision and guidance over the course of the SEIGMA project. The Commission's broad vision for the expansion of gambling in Massachusetts and commitment to the research needed to maximize the benefits and minimize the harms related to gambling in the Commonwealth made this project possible.

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A PDF OF THIS REPORT CAN BE DOWNLOADED AT: www.umass.edu/seigma

Executive Summary

Population surveys of gambling participation and gambling problems have become increasingly expensive and complex over time. An emerging option to improve surveillance is the use of annual online panel surveys to supplement less frequent population surveys. While online panels are not representative of the population, individuals who participate in such surveys are more likely to be heavy gamblers which provides a much greater ‘yield’ of individuals with characteristics of the greatest concern to policymakers, regulators, and others seeking to minimize and mitigate gambling harm.

This report assesses changes in gambling attitudes, gambling participation and problem gambling prevalence among monthly gamblers in the four most recent online panels in Massachusetts, carried out between 2022 and 2024. While online panels cannot be used to estimate population prevalence rates, it is reasonable to assume that changes in the behavior of monthly gamblers in the online panels do reflect changes in how heavy gamblers in the population are behaving. This report is the second in a series of reports tracking gambling attitudes, participation and problem gambling prevalence in Massachusetts at regular intervals.

Altogether, five online panel surveys have been carried out in Massachusetts as part of the SEIGMA study. The Baseline Online Panel Survey (BOPS) was fielded in 2013 and 2014; the Follow-up Online Panel Survey (FOPS) was fielded in March 2022; the 2023 Online Panel Survey (OPS23) was fielded one year later in March 2023; and two online panel surveys were fielded in the Spring and Fall of 2024. The goal of the online surveys was not to generate estimates of behaviors in the population but instead to track changes in behavior over time among monthly or more frequent gamblers. It is important to emphasize that we did not conduct a longitudinal study of the same people over time; instead, surveys were completed by different groups of people at each point in time.

Key Findings

This report presents results for monthly gamblers in our online panel surveys. We use the terms “among monthly gamblers in the online panels” and “among monthly gamblers” but this always refers only to panel members and not to the population of Massachusetts.

Attitudes Toward Gambling

- Rise in proportion of monthly gamblers in the online panels who believe that the harm of gambling outweighs the benefits from 2022 to 2024;
- Decline in proportion of monthly gamblers who believe that all types of gambling should be legal between 2022 and 2023;
- Rise in proportion of monthly gamblers who believe that gambling in Massachusetts is too widely available between 2022 and 2023.

Gambling Behavior

- Rising participation in most gambling activities from 2022 to 2023 followed by declines in Spring 2024 with no significant changes in Fall 2024;
- No significant change in participation in traditional large jackpot lottery games between 2022 and 2024;
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- Some recapture of illegal sports betting expenditures in Massachusetts among monthly gamblers between 2022 and 2024.

Gambling Problems and Harms

- Rise in problem gambling prevalence among monthly gamblers in the online panels between 2022 and 2023 with the rate maintained in 2024;
- Rise in family and relationship harms between 2022 and 2023 with another rise in Spring 2024 that was maintained in Fall 2024.

Recommendations

- Given rising rates of sports betting frequency, education and harm reduction strategies targeting sports bettors are warranted.
- There is a need to expand responsible gambling tools to support individuals reporting financial harms and/or family or relationship harms.

Introduction

In November, 2011, an [Act Establishing Expanded Gaming in the Commonwealth](#) was passed by the Legislature and signed by Governor Deval Patrick (Chapter 194 of the Acts of 2011). This legislation permitted casinos and slot parlors to be introduced in Massachusetts under the regulatory auspices of the Massachusetts Gaming Commission (MGC). Three casino licenses were available, with one allocated for the Greater Boston area, one for Western Massachusetts, and one for Southeastern Massachusetts. A single license for a slot parlor was also available, with no geographic restriction as to its location.

Following passage of the Expanded Gaming Act, two casinos and one slot parlor were approved by the MGC. The slot parlor, [Plainridge Park Casino \(PPC\)](#), is located in the Town of Plainville and opened on June 24, 2015. The Western Massachusetts casino, [MGM Springfield \(MGM\)](#), is located in the City of Springfield and opened on August 24, 2018. The Greater Boston casino, [Encore Boston Harbor \(EBH\)](#), is located in the City of Everett and opened on June 23, 2019. To date, no casino application has been approved for Southeastern Massachusetts.

Section 71 of the Expanded Gaming Act requires the MGC to establish an ‘annual research agenda’ and identifies three essential elements of this research agenda:

- A baseline study of problem gambling and the existing prevention and treatment programs that address its harmful consequences;
- Comprehensive studies of the social and economic impacts of gambling in the commonwealth; and
- Individual studies relative to the neuroscience, psychology, sociology, epidemiology, and etiology of gambling.

To accomplish the first two goals of the annual research agenda, the MGC issued a Request for Response for Research in November, 2012. In March of 2013, the MGC selected a research team from the University of Massachusetts Amherst (UMass) School of Public Health and Health Sciences to carry out a comprehensive research agenda that included both the baseline study of problem gambling and a study of the social and economic impacts of casino gambling in Massachusetts. The study, titled the *Social and Economic Impacts of Gambling in Massachusetts* (SEIGMA), was originally envisioned as a before-and-after evaluation of the impacts of the introduction of casinos in Massachusetts. However, the gradual introduction of casinos over an extended period from 2015 to 2019 led to the decision to produce periodic reports that comprehensively document the known impacts, with the first report published in 2018 (SEIGMA Research Team, 2018) and the next report anticipated in 2024.

In August, 2022, an [Act to Regulate Sports Wagering](#) was passed by the Massachusetts Legislature and signed into law by Governor Charlie Baker. This legislation allows for up to 15 sports betting licenses in the Commonwealth with eight of the licenses tied to a land-based partner (the three licensed casinos, three online licenses tethered to the casinos, and two racetracks still operating simulcast facilities) and the remaining seven online licenses open to competitive bidding. Individuals physically located in Massachusetts can wager on most professional sports leagues but cannot bet on in-state college teams unless the teams are playing in a tournament with four or more teams. The MGC is responsible for overseeing the establishment and regulation of the Massachusetts sports betting industry.

Monitoring Gambling and Problem Gambling in Massachusetts

Gambling-related harms are a tangible threat to public health and should be monitored as such (Price, Hilbrecht, & Billi, 2021). Surveillance is an essential component of an overall public health approach particularly for the prevention and mediation of harm. The recent introduction of sports betting to the Commonwealth underscores the importance of regular surveillance of gambling behavior in Massachusetts as new gambling types and formats are introduced. The shift to online gambling also introduces a new challenge to regulators and policymakers as gambling is no longer restricted to brick-and-mortar establishments but can be done anywhere and at any time. Going forward, new strategies and policies to track and respond to gambling-related harms in real time will become increasingly important (Marionneau, Ruohio, & Karlsson, 2023).

The SEIGMA team has fielded multiple surveys of gambling participation and problem gambling prevalence since 2013. Table 1 presents information about these surveys, including sample sizes and the year each one was carried out.

Table 1 SEIGMA surveys in Massachusetts

Survey	Sample Size	Year
Baseline General Population Survey (BGPS)	9,578	2013-2014
Baseline Online Panel Survey (BOPS)	5,046	2013-2014
Baseline Targeted Surveys (Plainville, Springfield) (B-TPP, B-TPS)	~1,000 each	2014, 2015
Follow-up Targeted Surveys (Plainville, Springfield) (F-TPP, F-TPS)	~1,000 each	2016, 2019
Follow-up General Population Survey (FGPS)	6,293	2021-2022
Follow-up Online Panel Survey (FOPS)	3,038	2022
Online Panel Survey 2023 (OPS23)	3,380	2023
Online Panel Survey 2024-Spring (OPS24 Spring)	3,383	2024
Online Panel Survey 2024-Fall (OPS24 Fall)	3,045	2024
MA Gambling Impact Cohort (MAGIC) – 5 waves	3,139	2013-2019

In line with the original research plan for SEIGMA, the Baseline and Follow-up Online Panel Surveys (BOPS, FOPS) were implemented in 2014 and 2022. The original purpose of the online panels was to recruit a significantly larger number of heavy gamblers and those experiencing gambling problems than could be obtained with address-based sampling methods. These enriched samples provided more reliable estimates of the behaviors and characteristics of Massachusetts adults at highest risk of experiencing gambling harms, the negative personal impacts of gambling, the differential impact of different types of gambling on gambling-related problems, and prevention awareness and treatment-seeking behavior of individuals experiencing gambling problems.

While online panels cannot be used to estimate population prevalence rates, it is reasonable to assume that changes in the behavior of online panelists do reflect changes in how heavy gamblers in the general population are behaving. The SEIGMA team recently concluded that while online panel surveys cannot be used to establish accurate gambling participation and problem gambling prevalence rates, they hold considerable value as a means to identify the **direction of changes** in gambling-related attitudes, behaviors, and harms on a regular basis. Fielding annual online panel surveys, as the SEIGMA team has done over the past few years, is a time- and cost-effective way of conducting regular surveillance and providing regulators and policymakers with crucial information to target gambling-harm mitigation strategies. This approach takes advantage of a ‘bug’ in the nature of online panels and turns it into a ‘feature.’

This report presents information about changes in gambling participation and problem gambling prevalence among monthly gamblers across four online panel surveys carried out in Massachusetts between 2022 and 2024. Changes in views of gambling as a recreational activity, in rates of gambling participation, gambling problems and gambling-related harms are also addressed. This report is modeled on an earlier report that summarized results from online panel surveys carried out in Massachusetts in 2014, 2022 and 2023 (Volberg, Zorn, Evans, & Williams, 2024).

Overview of Methods

Online panels consist of groups of people recruited to participate in online surveys in return for compensation. Sociodemographic and behavioral information is collected from panel members so that a stratified sample can be selected to match the sociodemographic characteristics of the jurisdiction where a survey is conducted. The advantages of online panel surveys are that (a) the validity of answers to ‘sensitive questions’ (e.g., gambling) tends to be higher in self-administered formats (Tourangeau & Smith, 1996; van der Heijden, Van Gils, Bouts, & Hox, 2000); (b) everyone has agreed and expects to be contacted (unlike population surveys); (c) the results can be obtained in a much shorter period of time; and (d) they are much less expensive than surveys utilizing probability sampling (Olson et al., 2021).

The main limitation of online panels is that panelists are not randomly selected but rather have self-enrolled. While online panel companies generally stratify their samples to be demographically representative of the population, significant behavioral biases typically remain that cannot be corrected by this stratification or by demographic weighting (e.g., Pickering & Blaszczyński, 2021; Williams, Lee & Back, 2013). One obvious issue is that a non-random minority of people do not use the Internet and thus are not eligible to be part of an online panel. An additional consistent finding is that online panel members tend to have much higher levels of pathology than are found in the general population, including overall rates of substance use, mental health problems, gambling involvement, and addictions.

While we have been careful to emphasize that the results of online panel surveys cannot be used to estimate population prevalence, there are other assumptions built into our approach that could affect the interpretation of the results. For example, it is important to acknowledge that our central assumption, namely that monthly gamblers in the online panels are representative of heavy gamblers in Massachusetts, may not be as well-founded as we believe. It is also possible that the characteristics of people who agree to participate in online panel surveys may change over time which would render trends observed over time unreliable. One final point to emphasize is that we did not conduct a longitudinal study of the same people over time; instead, surveys were completed by different groups of people at each point in time.

Online Panel Surveys in Massachusetts, 2014-2024

Five online panel surveys have been carried out in Massachusetts as part of the SEIGMA study. The Baseline Online Panel Survey (BOPS) was fielded in 2013 and 2014 simultaneously with the Baseline General Population Survey (BGPS). The Follow-up Online Panel Survey (FOPS) was fielded in 2022 simultaneously with the Follow-up General Population Survey (FGPS). The third Online Panel Survey (OPS23) was fielded one year after the FOPS in 2023. A fourth online panel survey was fielded in March 2024 and a fifth online panel survey was completed in December 2024.¹

Ethics approval was obtained for all of the surveys from the University of Massachusetts Institutional Review Board (IRB# 175 2013-1709). The review ensured that privacy was protected, informed consent was obtained, and safeguards were in place to protect the data.

¹ The fifth online panel survey was fielded in order to provide the MGC with up-to-date surveillance information in the event that the current SEIGMA research team is unsuccessful in competing for a re-procurement of the project in 2025.

Recruitment and Sample

Qualtrics conducted the Follow-up Online Panel Survey (FOPS), the 2023 Online Panel Survey (OPS23) and both of the 2024 Online Panel Surveys (OPS24 Spring and OPS24 Fall). Qualtrics maintains an online panel of individuals who have agreed to participate in research studies in return for small incentives and have provided demographic information about themselves. In each case, this information was used to recruit a sample of Massachusetts adults with quotas established for age and gender but with no limitation by region with the exception of the FOPS. The FOPS was fielded in March 2022, OPS23 was fielded in March 2023, OPS24 Spring was fielded in March-April 2024 and OPS24 Fall was fielded in October-December 2024.

Comparing Monthly Gamblers in the Panels with the General Population

Our analysis of the online panel data is focused on the subset of panelists who gambled monthly or more often in the past year after eliminating a small number of panelists in each survey who had the same IP address as a panelist in the previous survey. This focus is intended to highlight changes in the behavior and experiences of the most heavily involved gamblers in the panels. Eliminating the small number of panelists with identical IP addresses was done to ensure independent observations across the samples which is a critical assumption underlying many statistical tests. Table 2 presents information about the size of the groups of monthly gamblers in each of the online panels carried out in Massachusetts.

Table 2 Online panel samples for analysis

Online Panel	Overall Sample	After Removing Duplicates	%	Gambled Monthly or More	%
FOPS 2022	3038	3038	100	1631	53.7
OPS23 2023	3380	3215	95 .1	1866	58.0
OPS24 Spring	3383	3241	95.8	1916	59.1
OPS24 Fall	3045	2806	92.1	1577	56.2

To provide context for the findings, it is helpful to compare the monthly gamblers in the online panels with characteristics of the general population. Monthly gamblers in the panels were more likely than the adult Massachusetts population to be male, more likely to be under the age of 35, more likely to be Hispanic or Black and less likely to be Asian, more likely to have obtained some college education, and less likely to have annual household incomes of \$50,000 or more. Table 11 in the Appendix provides detailed information about the demographics of monthly gamblers in the Massachusetts online panels compared with Massachusetts adults.²

² Readers may be surprised that members of online panels tend to have higher education but lower income than the population. However, research shows that lower education is associated with less likelihood of completing online surveys (Jang & Vorderstrasse, 2019). Studies have also found that survey respondents in lower socio-economic populations are more likely to have graduated college compared to non-respondents (Roberts et al., 2020).

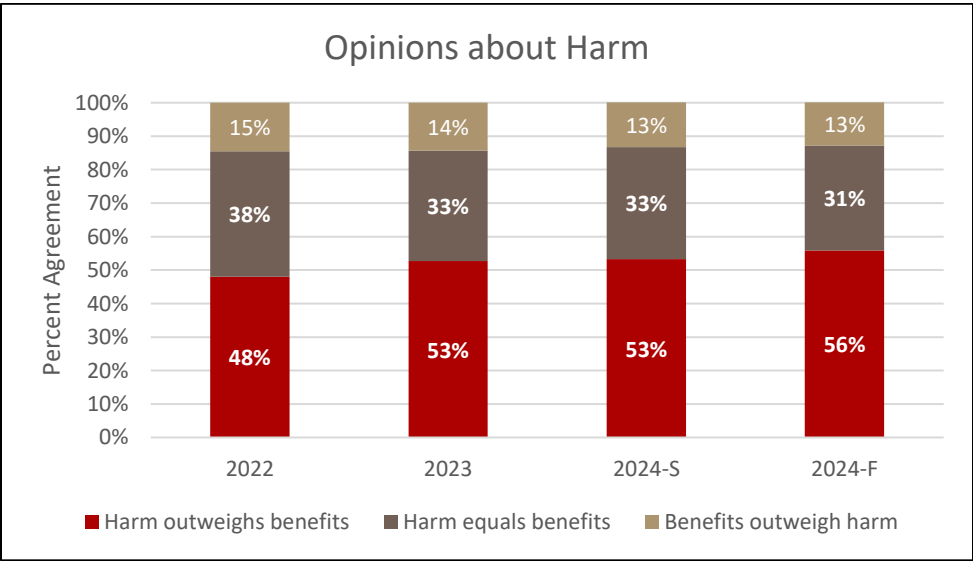
Attitudes Toward Gambling

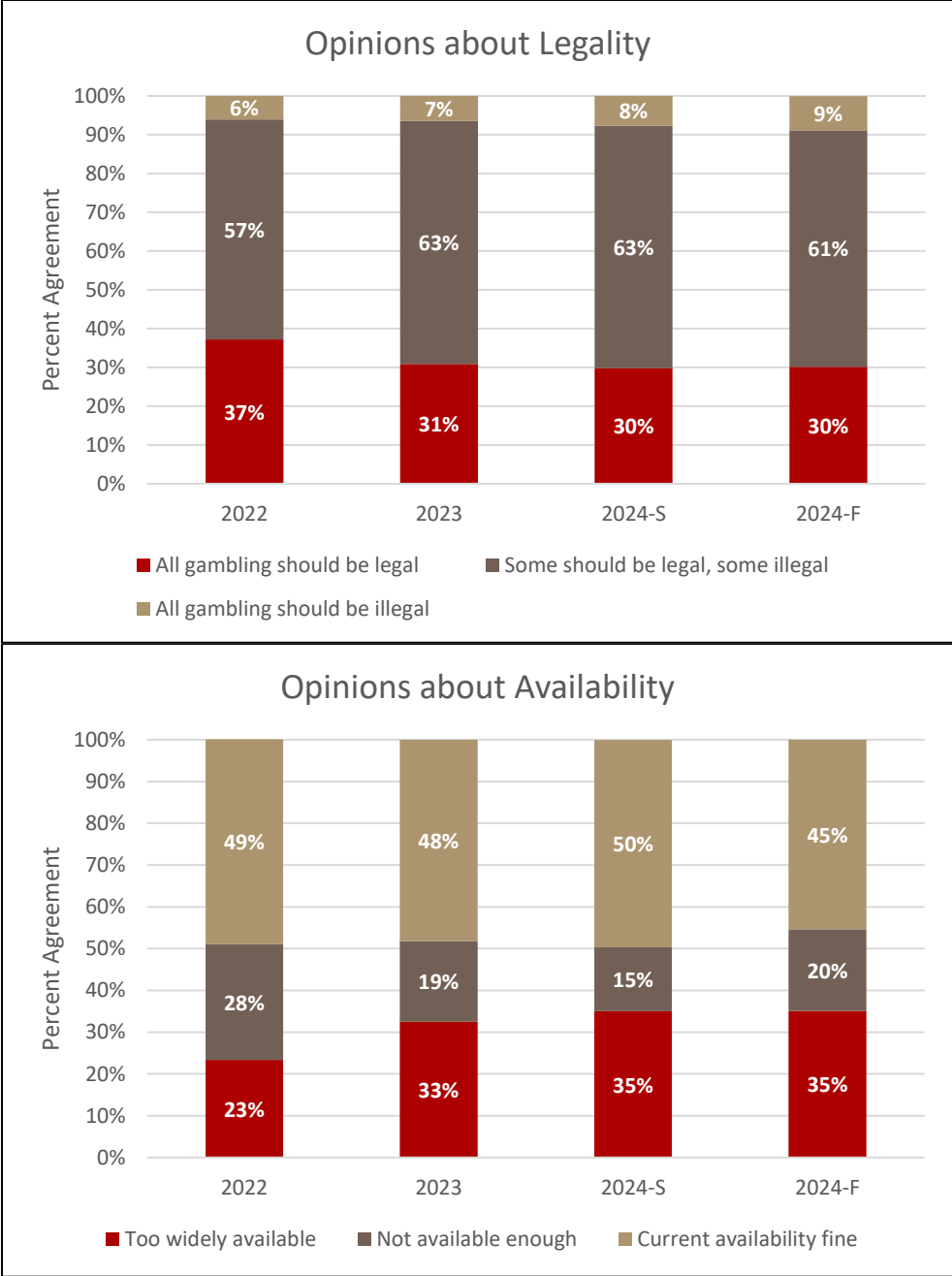
Before examining gambling participation among monthly gamblers in the online panels, it is helpful to consider these gamblers’ attitudes toward gambling in Massachusetts. Online panelists were asked several questions about their views of gambling. Questions assessed panelists’ beliefs about the overall benefit or harm of gambling in society, about legalized gambling in general, and about the availability of gambling in Massachusetts. Figure 1 presents information about the proportion of monthly gamblers in each online panel that endorsed different answers to several of these questions. Statistical significance is based on non-overlapping 95% confidence intervals.

With respect to beliefs about the overall benefit or harm of gambling in society, monthly gamblers in 2024 (Spring and Fall) were significantly more likely than monthly gamblers in 2022 to believe that the harm of gambling outweighs the benefits. Monthly gamblers in Fall 2024 were significantly less likely than monthly gamblers in 2022 to believe that the benefits and harm of gambling were about equal. Monthly gamblers in 2023 and 2024 (Spring and Fall) were significantly less likely than monthly gamblers in 2022 to believe that all types of gambling should be legal; monthly gamblers in Fall 2024 were significantly more likely than monthly gamblers in 2022 to believe that all types of gambling should be illegal. Monthly gamblers in 2023 and 2024 (Spring and Fall) were significantly more likely than monthly gamblers in 2022 to believe that gambling was too widely available in Massachusetts and significantly less likely to believe that gambling was not available enough.

While the changes in attitudes toward gambling identified among monthly gamblers in the online panel surveys cannot be generalized to the Massachusetts population, it is notable that attitudes towards gambling among monthly gamblers became less favorable in the wake of sports betting legalization in Massachusetts, which occurred in 2022. Detailed information about gambling attitudes among monthly gamblers in the online panels is presented in Table 12 in the Appendix.

Figure 1 Attitudes about gambling among monthly gamblers in the online panels (unweighted)





Note: Results with confidence intervals are presented in Table 12 in the Appendix.

Gambling Behavior

Information on overall past-year gambling participation as well as participation in specific types of gambling among monthly gamblers in the online panel surveys carried out in Massachusetts between 2022 and 2024 is helpful in understanding changes in the gambling behavior of heavy gamblers during a period when sports betting was legalized and became operational in the state. Again, while data from the online panel surveys is not representative of the population, changes from one time to the next provide suggestive evidence of changes in gambling participation in Massachusetts in recent years.

Figure 2 presents past-year gambling participation rates among monthly gamblers in the online panels for the types of gambling available to Massachusetts adults. Detailed results are presented in Table 13 in the Appendix with confidence intervals. Information about statistically significant differences in the results is presented in Table 14.³ Figure 2 shows that past-year participation rates among monthly gamblers in the online panels were higher for the majority of specific types of gambling in 2023 compared to 2022 (10 out of 12 specific types of gambling). Another common pattern is that past-year participation rates in Spring 2024 were higher for the majority of specific types of gambling compared to 2022 (9 of 12 specific types). Past-year participation was not significantly higher for any specific types of gambling in Spring 2024 compared to 2023. Instead, past-year participation rates in Spring 2024 were significantly lower for the majority of specific types of gambling compared to 2023 (8 of 12 specific types). Past-year participation rates among monthly gamblers in Fall 2024 were significantly higher compared to 2022 for the majority of specific activities (9 of 12 specific types). Past-year participation rates in Fall 2024 were significantly lower than in 2023 for three specific types of gambling and the only significant difference between Spring 2024 and Fall 2024 was in past-year participation in bingo.

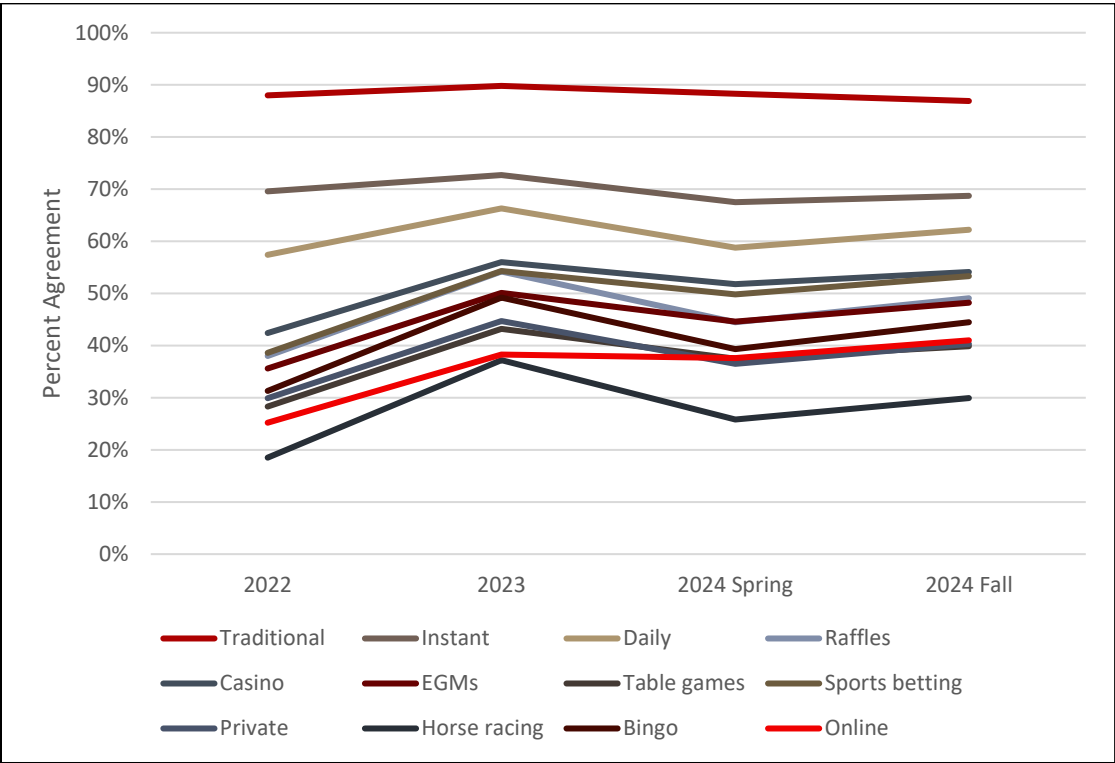
Our conclusion is that the most common pattern in past-year participation in specific types of gambling among monthly gamblers in the online panels was higher participation in 2023 compared to 2022 and lower participation in Spring 2024 compared to 2023 albeit with rates still higher than in 2022. Past-year participation in Fall 2024 was higher compared to 2022 as was the case in 2023 and Spring 2024. Compared to Spring 2024, past-year participation rates in Fall 2024 were lower although the differences were less likely to be statistically significant. There were no significant differences in past-year participation in traditional large jackpot lottery games among monthly gamblers in the online panels across the four surveys. Past-year participation in instant lottery games was lower in Spring 2024 compared to 2023 but not compared to 2022 or Fall 2024.

Recalling the results of the Follow-up General Population Survey (FGPS) where we identified significantly lower rates of gambling participation in 2021 compared to 2013, well after the worst of the COVID-19 pandemic, it was interesting to observe higher rates of participation in most types of gambling among monthly gamblers in the 2023 online panel compared with 2022. We took those findings to suggest that the lingering impact of the pandemic on gambling behavior among monthly gamblers in Massachusetts may have diminished (Volberg et al., 2024). It is unclear why past-year participation rates for most types of gambling remained higher in 2024 among monthly gamblers in the online panels compared to 2022. It is possible that this reflects a further

³ Results of gambling prevalence surveys typically report past-year participation rates for the entire sample rather than restricting reports to monthly gamblers. To facilitate comparisons to other jurisdictions, information about past-year participation in specific gambling activities for the full samples from the online panel surveys is presented in Table 15 in the Appendix.

adjustment of gambling behavior to current social and economic conditions but there may be other, non-behavioral explanations for these differences such as changes in sample composition.

Figure 2 Past-year gambling participation among monthly gamblers in MA online panels (unweighted)



Beyond past-year participation, it is helpful to consider differences in gambling intensity among monthly gamblers in the online panels. Gambling intensity includes the number of gambling formats engaged with in the past year and the highest frequency of gambling (i.e., number of days gambled in the past year). Table 3 presents information about differences in these measures of gambling involvement among monthly gamblers across the four panels. The mean number of gambling formats was significantly higher in 2023 compared to 2022 and significantly lower in Spring 2024 compared to 2023 (although still higher than 2022) before rising significantly again in Fall 2024. The number of days gambled in the past year rose significantly between 2022 and 2023 and then remained steady through Fall 2024. Finally, median gambling expenditures rose significant between 2022 and 2023 and did not change significantly between 2023 and Fall 2024.⁴

⁴ There were differences in how gambling expenditures were measured in 2022 compared with the later online panel surveys. In 2022, panelists were allowed to record how much money they spent on each activity in a typical month using a negative sign to indicate losses and a positive sign to indicate winning in a typical month. Starting in 2023, panelists were restricted to reporting losses using categorical ranges. After considering several approaches to align data across the surveys, we chose to report median expenditures to focus on differences in losses.

Table 3 Gambling intensity among monthly gamblers in MA online panels (unweighted)

	FOPS 2022			OPS2023			OPS2024 Spring			OPS2024 Fall		
	n	mean	95% CI	n	mean	95% CI	n	mean	95% CI	n	mean	95% CI
# gambling formats	1631	4.6	(4.5, 4.7)	1866	6.0	(5.8, 6.2)	1916	5.3	(5.2, 5.4)	1577	5.6	(5.5, 5.8)
Highest frequency of days/year	1631	103	(98.2, 107.9)	1866	112.6	(108.1, 117.0)	1916	108.8	(104.3, 113.3)	1577	113.1	(108.1, 118.1)
	FOPS 2022			OPS2023			OPS2024 Spring			OPS2024 Fall		
	n	median	95% CI	n	median	95% CI	n	median	95% CI	n	median	95% CI
Gambling expenditures	784	\$1044	(\$700, \$1387)	1866	\$2910	(\$2282, \$3538)	1916	\$2220	(\$1653, \$2787)	1577	\$2280	\$1704, \$2857)

Focus on Sports Betting

As noted in the *Introduction*, Massachusetts legalized sports betting in August 2022 and tasked the MGC with overseeing the industry. The law created three categories of licenses, including in-person sports betting at casinos; in-person sports betting at racetracks and/or simulcast centers; and online or mobile sports betting. The three licensed casinos in Massachusetts were granted Category 1 sportsbook licenses that became effective at the end of January 2023. Nine operators were initially granted Category 3 licenses to offer online sports betting that rolled out beginning in March 2023. As of May 2025, four mobile sportsbooks tethered to the land-based casinos and three untethered sportsbooks (DraftKings, FanDuel and Bally Bet) were licensed and operating in Massachusetts. As of May 2025, no Category 2 sports betting licenses had been awarded.

Given the recent introduction of legal sports betting in Massachusetts, it is informative to first consider how past-year sports betting behavior changed among all members of the online panels before narrowing our focus to monthly gamblers. Among the **online panels as a whole**, past-year participation in sports betting rose from 16.7% in March 2022 before sports betting was legalized in Massachusetts to 26.9% in March 2023 just as the Category 3 sportsbooks began operating and remained steady at 32.6% in both of the 2024 panels.

Table 4 presents information about sports betting participation among monthly gamblers in the 2022 through 2024 online panels. Table 4 shows that in 2022, 61.4% of monthly gamblers in the panel had not gambled on sports in the past year while 31.7% had gambled on sports at least monthly or weekly in the past year. In 2023, there was a decline in the proportion of monthly gamblers who had not gambled on sports in the past year (to 45.7%) and a rise in the proportion of monthly gamblers who had gambled on sports at least monthly or weekly (to 47.5%). In 2024, the proportion of monthly gamblers who had not gambled on sports in the past year remained steady at about 50% while the proportion of monthly gamblers who had gambled at least monthly on sports declined to 41.5% in Spring 2024 and rose slightly to 45.5% in Fall 2024.

Table 4 Past-year sports betting frequency and activities among monthly gamblers (unweighted)

		FOPS 2022		OPS2023		OPS2024 Spring		OPS2024 Fall	
		%	95% CI	%	95% CI	%	95% CI	%	95% CI
Frequency of sports betting	1=never	61.4	(59.0, 63.8)	45.7	(43.4, 47.9)	50.2	(47.9, 52.4)	46.7	(44.2, 49.1)
	2=at least yearly	6.9	(5.7, 8.2)	6.8	(5.7, 8.0)	8.4	(7.2, 9.7)	7.9	(6.6, 9.3)
	3=at least monthly	12.8	(11.3, 14.5)	19.2	(17.5, 21.0)	16.0	(14.4, 17.7)	19.2	(17.3, 21.2)
	4=at least weekly	18.9	(17.1, 20.9)	28.3	(26.3, 30.4)	25.5	(23.6, 27.5)	26.3	(24.2, 28.5)
Type of sports betting engaged in	Professional sporting events	60.4	(56.5, 64.2)	61.9	(58.9, 64.9)	64.7	(61.6, 67.7)	61.1	(57.8, 64.4)
	Sports parlays	36.9	(33.2, 40.7)	51.2	(48.1, 54.3)	49.3	(46.2, 52.5)	50.2	(46.8, 53.6)
	Fantasy sports betting	32.4	(28.9, 36.2)	34.6	(31.7, 37.6)	29.2	(26.4, 32.2)	28.5	(25.6, 31.7)
	Betting on sports you participated in	11.8	(9.5, 14.5)	13.2	(11.3, 15.4)	12.5	(10.5, 14.7)	12.5	(10.4, 14.9)

The decline in the proportion of monthly gamblers who had responded ‘never’ to betting on sports between 2022 and 2023 was statistically significant. The rise in weekly sports betting between 2022 and 2023 was statistically significant and remained significantly higher in both of the 2024 panels compared to 2022. The rise in monthly sports betting between 2022 and 2023 was statistically significant as was the difference between 2022 and Fall 2024. All of these changes were likely associated with the launch of legal sports betting operations in Massachusetts between January and March 2023.

Participation in Specific Types of Sports Betting

Detailed information about sports betting formats was collected in all of the online panel surveys. Panel members who had bet on sports in the past year were asked where and how they bet on sports. Options included:

- Office sports pools or social betting against friends or family
- Placing bets with a legal, land-based sportsbook outside of Massachusetts
- Placing bets with a legal, land-based sportsbook within Massachusetts
- Placing bets with an illegal/underground land-based sportsbook or bookmaker in Massachusetts
- Placing bets on sporting events with an online sportsbook outside of Massachusetts
- Placing bets on sporting events with an online sportsbook within Massachusetts

Table 5 shows that there was a significant decline in participation in office sports pools and social betting between 2022 and 2023 but very little change between 2023 and 2024. The rise in betting with legal, land-based sportsbooks in Massachusetts from 22.6% in 2022 to 42.6% in 2023 was significant and participation higher in both 2024 surveys. There was a significant decline in betting on sporting events with an online sportsbook outside of Massachusetts between 2022 and 2023 followed by a rise in this type of betting in Spring 2024. The rise in betting on sporting events with an online sportsbook in Massachusetts from 11.4% in 2022 to 26.6% in 2023 was significant and this type of sports betting remained significantly higher in both 2024 surveys compared with 2022.

There were no significant changes in sports betting with legal, land-based sportsbooks outside of Massachusetts between 2022 and 2024. There were also no significant changes in sports betting with illegal/underground land-based sportsbooks or bookmakers in Massachusetts.

Table 5 Past-year participation by monthly gamblers in sports betting formats (unweighted)

		FOPS 2022		OPS 2023		OPS 2024 Spring		OPS 2024 Fall	
		%	95% CI	%	95% CI	%	95% CI	%	95% CI
Where and how bet on sports	Office sports polls or social betting against friends/family	49.3	(45.4, 53.2)	33.6	(30.8, 36.6)	36.6	(33.6, 39.8)	32.2	(29.1, 35.5)
	Legal land-based sportsbook outside MA	29.3	(25.8, 32.9)	31.8	(29.0, 34.7)	26.7	(24.0, 29.6)	32.3	(29.3, 35.6)
	Legal land-based sportsbook in MA	22.6	(19.5, 26.0)	42.6	(39.6, 45.7)	35.9	(32.9, 39.0)	36.0	(32.8, 39.3)
	Illegal/underground land based sportsbook or bookmaker in MA	16.9	(14.1, 20.0)	19.6	(17.3, 22.2)	13.6	(11.6, 15.9)	16.3	(13.9, 18.9)
	Sports event with online sportsbook outside MA	22.4	(19.3, 25.8)	16	(13.8, 18.4)	20.9	(18.5, 23.6)	20.5	(17.9, 23.3)
	Sports event with online sportsbook in MA	11.4	(9.2, 14.2)	26.6	(24.0, 29.4)	30.3	(27.4, 33.3)	26.9	(24.0, 30.0)

Legal and Illegal Sports Betting Between 2022 and 2024

To elucidate the question of recapture of sports betting expenditures via legalization of sports betting in Massachusetts, the types of sports betting included in the panel surveys were divided into legal and illegal activities. Panelists were classified as having done no sports betting, only legal sports betting (including legal venues in other jurisdictions), both legal and illegal sports betting, and only illegal sports betting on the basis of their responses to a question about sports betting formats. It is important to note that the last two options under ‘Legal sports betting’ were not legal in Massachusetts in 2022 since sports betting did not become fully operational in the Commonwealth until March 2023.

Legal sports betting included:

- Office sports pools and social/friendly betting,⁵
- Placing bets with a legal land-based sportsbook outside of Massachusetts,
- Placing bets with a legal, land-based sportsbook within Massachusetts, and
- Placing bets with an online sportsbook in Massachusetts.

Illegal sports betting included:

- Placing bets with an illegal land-based bookmaker in Massachusetts, and
- Placing bets on sports events with an online sportsbook outside of Massachusetts.⁶

Table 6 shows that there was no change in the proportion of monthly gamblers in the online panels who had engaged in **any illegal** sports betting between 2022 and 2024 but a decrease in the proportion of monthly gamblers who engaged in **only illegal sports betting**. There was also no change in sports betting ‘leakage’ (i.e., spending on sports betting operators outside of Massachusetts). Finally, in response to a question in the 2023

⁵ Although technically illegal under Massachusetts law, informal sports betting with friends and family is widely tolerated and rarely prosecuted (<https://malegislature.gov/Laws/GeneralLaws/PartIV/TitleI/Chapter271/Section1>).

⁶ Betting with a legal online sportsbook outside of Massachusetts would not be illegal if the bettor were physically located outside the Commonwealth.

and 2024 surveys, approximately half of monthly gamblers indicated that if Massachusetts had not legalized sports betting, they would have gambled on sports in other jurisdictions or online with an out-of-state operator.

Table 6 Legal and illegal sports betting by monthly gamblers (unweighted)

	FOPS 2022		OPS 2023		OPS 2024 Spring		OPS 2024 Fall	
	%	95% CI	%	95% CI	%	95% CI	%	95% CI
Only legal sports betting	66.1	(62.3, 69.7)	68.1	(65.2, 70.9)	69.6	(66.6, 72.5)	67.4	(64.2, 70.5)
Any illegal sports betting	33.9	(30.3, 37.7)	31.9	(29.1, 34.8)	30.4	(27.5, 33.4)	32.6	(29.5, 35.8)
Only illegal sports betting	13.5	(11.1, 16.4)	6.8	(5.4, 8.5)	7.3	(5.8, 9.2)	8.3	(6.6, 10.4)
Any sports betting leakage	54.5	(50.6, 58.4)	51.2	(48.1, 54.3)	47.7	(44.6, 50.9)	53.5	(50.1, 56.9)
If MA had not legalized sports betting, would you have spent the money that you spent gambling on sports at sportsbooks in other states or countries (on-line or in person)			53.0	(47.0, 58.9)	45.0	(40.9, 49.2)	49.7	(45.2, 54.2)

Taken together, these data suggest that there has been some recapture of illegal sports betting revenues in Massachusetts between 2022 and 2024. This is evidenced by the significant rise in the proportion of monthly gamblers in the online panels who gambled at a legal land-based sportsbook in Massachusetts and in the proportion of monthly gamblers who gambled with an online sportsbook in Massachusetts. It is further evidenced by the significant decline in the proportion of monthly gamblers who only placed bets with an illegal land-based bookmaker in Massachusetts.

As we noted in the first report in this series (Volberg et al., 2024), many jurisdictions internationally have found that it can take a substantial period of time for sports bettors to migrate fully from non-regulated to regulated providers (Lopez-Gonzalez, 2021). The latest national gambling study in Canada found that market capture of sports betting increased significantly over time as bettors became more aware of and gravitated towards legal options.

Gambling Problems and Gambling Harms

Many instruments exist for the population assessment of problem gambling. Internationally, the most commonly used instruments are the South Oaks Gambling Screen (SOGS) (Lesieur & Blume, 1987), the Problem Gambling Severity Index (PGSI) (Ferris & Wynne, 2001) and various scales based on the DSM diagnostic criteria for pathological gambling (e.g., Fisher, 2000; Gerstein, Volberg, Harwood, & Christiansen, 1999; Kessler et al., 2008; Petry, Stinson, & Grant, 2005). In Massachusetts, the Problem and Pathological Gambling Measure (PPGM) (Williams & Volberg, 2014) has served as the primary instrument to assess problem gambling in all of the SEIGMA surveys.

Measuring Problem Gambling in Massachusetts

The PPGM is a 14-item assessment instrument with questions organized into three sections: Problems, Impaired Control, and Other Issues. The instrument employs a 12-month timeframe and recognizes a continuum of gambling across four categories (Recreational, At-Risk, Problem, and Pathological). In contrast to other problem gambling instruments, in which any pattern of item endorsement that results in a score above a certain threshold is sufficient to be designated as a problem gambler, the PPGM requires endorsement of one or more items from the Problems section and one or more items from the Impaired Control section to classify an individual as a **Problem Gambler**. Endorsement of a problem or impaired control, but not both, typically leads to classification as an **At-Risk Gambler**. Gamblers who do not meet the criteria for At-Risk, Problem, or Pathological Gambling are deemed to be **Recreational Gamblers**. Table 7 presents the PPGM typology and the criteria required for classification across these groups.

Table 7 Basis for classifying panelists using the PPGM

Category	Classification criteria
Non-Gambler	Has not gambled in the past 12 months
Recreational Gambler	Has gambled in past 12 months Total score 0
At-Risk Gambler	Total score 1+ Does not meet criteria for more severe categories OR Gambling frequency and expenditure \geq PG median
Problem Gambler	Has gambled at least once a month in past 12 months Impaired Control score 1+ Problems score 1+ Total score of 2-4 OR Total score 3+ Gambling frequency and expenditure \geq PG median
Pathological Gambler (equivalent to severe problem gambler)	Has gambled at least once a month in past 12 months Impaired Control score 1+ Problems score 1+ AND Total score of 5+

Revising the PPGM

Research has shown that, relative to other instruments, the PPGM varies less as a function of gender, age and ethnicity, is better suited to capture the multidimensional nature of problem gambling and is better able to differentiate between levels of severity (Christensen, Williams, & Ofori-Dei, 2019; Molander & Wennberg, 2022; Williams & Volberg, 2014). Despite its better performance in the assessment of problem gambling, other categories of the PPGM have lacked rigor. This is particularly true of the At-risk Gambler category, which is operationalized as levels of symptomatology below the Problem Gambler threshold. While the label ‘at-risk’ implies the possibility of developing more serious problems, it is also the case that endorsing low levels of symptomatology may be a ‘wake-up call’ for individuals to reduce their gambling involvement. This view is supported by several longitudinal studies of gambling conducted internationally, which have found the ‘at-risk’ category of both the PGSI and the PPGM to be poorly predictive of future problem gambling (e.g., Billi, Stone, Marden, & Yeung, 2014; el-Guebaly et al., 2015; MAGIC Research Team, 2021).

A related issue is a recent shift internationally from a narrow focus on problem gambling to a broader concern with gambling-related harm. This shift represents a change from a strictly addiction-based model toward a public health model focused on populations and emphasizing a continuum of gambling harms and/or problems (Korn & Shaffer, 1999). Studies show that while those with problem gambling experience higher levels of individual harm, the majority of harm in the population actually occurs in lower-risk groups because of their greater size (Browne, Volberg, Rockloff, & Salonen, 2020; Canale, Vieno, & Griffiths, 2016; Raisamo, Mäkelä, Salonen, & Lintonen, 2015; Volberg, Zorn, Williams, & Evans, 2021). This new focus is also evidenced in the newly developed Lower Risk Gambling Guidelines (LRGG; Hodgins et al., 2022; Young et al., 2021, 2024) which identify risk factors for gambling-related harm rather than problem gambling.

Recently, Gooding, Williams and Volberg (2024) used data from the latest Canadian longitudinal study of gambling to revise the PPGM and test the possibility of better discriminators for ‘at-risk’ gamblers who would be most likely to develop more severe gambling problems. The resulting instrument includes the original 14 items that make up the PPGM and one new item measuring perception of gambling problems⁷ and was renamed the Problem Gambling Measure (PGM). The study identified five robust predictors of future gambling harm and problem gambling⁸ which allow for distinctions between ‘moderate’ at-risk gambling (only 13.1% of people classified in this way will be classified as problem gamblers one year later) and ‘high’ or ‘very high’ at-risk gambling (28.1% and 42.9% of people classified in this way will be classified as problem gamblers one year later). The study also identified that a score of seven and higher on the PGM was predictive of continued problem gambling one year later (i.e., chronicity).

For the two most recent online panel surveys in Massachusetts, we used the Problem Gambling Measure (PGM) to assess gambling problems and harms. Table 8 presents the PGM typology and the criteria required for classification across these groups.

⁷ The new item, “Have you ever thought that you might have a gambling problem?” follows the 14 items that make up the PPGM.

⁸ The five predictors include (1) PPGM total score, (2) problem perception, (3) rated importance of gambling as a leisure activity, (4) largest single day gambling loss, and (5) proportion of social group with gambling problems (Gooding et al., 2024).

Table 8 Basis for classifying respondents using the PGM

Category	Classification criteria
Non-Gambling	Has not gambled in the past 12 months
Recreational Gambling	Has gambled in past 12 months Total score 0
At-Risk Gambling	Does not meet criteria for Problem Gambling Total score 1+ 1. Total PGM score: 0 = 0; 1-2 = 2; 3+ = 5 2. Score on PGM15: 0 = 0; 1 = 2 3. Number of types of gambling monthly: 0-2 = 0; 3-4 = 1; 5+ = 4 4. Largest amount lost in single day: <\$200 = 0; \$200-\$499 = 1; \$500+ = 3 5. Importance of gambling as recreational activity: not very important = 0; somewhat important = 1; quite/very important = 2
Moderate At-Risk	Total score 1+
High At-Risk	Total score 4+
Very High At-Risk	Total score 8+
Problem Gambling	Has gambled at least once a month in past 12 months Impaired Control score 1+ Problems score 1+ Total score of 2+ with score of 7+ predictive of continued PG in next 12 months OR Total score 3+ Gambling frequency and expenditure ≥ PG median

Problem Gambling among Monthly Gamblers in the Online Panel Surveys

Information about the prevalence of recreational, at-risk and problem gambling among monthly gamblers in the online panels is presented in Table 9. Results from 2022 and 2023 are based on the PPGM while results from the two 2024 surveys are based on the PGM. It is important to reiterate that changes in problem gambling prevalence among monthly gamblers in the online panels cannot be generalized to the Massachusetts population.

Table 9 shows that the prevalence of problem gambling among monthly gamblers rose significantly between 2022 and 2023 and rose significantly again in Fall 2024 compared to 2022. The decline in recreational gambling in the two 2024 surveys compared to the earlier surveys is primarily due to the wider net cast by the PGM moderate at-risk category which requires that a person receive a total score of one or more but no longer requires that they have gambling frequency or expenditure greater than or equal to the median for problem gamblers. Using the PPGM criteria, the rate of recreational gambling was 51.8% in Spring 2024 and 47.1% in Fall 2024. The Spring 2024 rate of recreational gambling using the PPGM criteria was not significantly different from the 2022 rate while the Fall 2024 rate was significantly lower than the 2022 rate. Similarly, using the PPGM criteria, the rate of at-risk gambling was 25.2% in Spring 2024 and 25.3% in Fall 2024. There were no significant differences in the rate of at-risk gambling using the PPGM criteria across the four surveys.⁹

⁹ Table 16 in the Appendix presents problem gambling prevalence among monthly gamblers in the MA online panels based on the PPGM. There is a small discrepancy in the number of individuals classified as problem gamblers compared to the PGM which is due to the addition of the new item to the measure (n = 2 in Spring 2024; n = 6 in Fall 2024).

Table 9 Problem gambling prevalence among monthly gamblers in MA online panels (unweighted)

	FOPS 2022			OPS 2023			OPS 2024 Spring			OPS 2024 Fall		
	N	%	95% CI	N	%	95% CI	N	%	95% CI	N	%	95% CI
Total	1631	100 (,)		1866	100 (,)		1916	100 (,)		1577	100 (,)	
Recreational gambler	888	54.4 (52.0,56.9)		921	49.4 (47.1,51.6)		580	30.3 (28.3,32.4)		462	29.3 (27.1,31.6)	
At-risk gambler	402	24.6 (22.6,26.8)		467	25.0 (23.1,27.0)							
At-risk gambler-Moderate							505	26.4 (24.4,28.4)		395	25.0 (23.0,27.2)	
At-risk gambler-High/Very high							386	20.1(18.4,22.0)		278	17.6 (15.8,19.6)	
Problem or pathological gambler	341	20.9 (19.0,23.0)		478	25.6 (23.7,27.6)		445	23.2 (21.4,25.2)		442	28.0 (25.9,30.3)	

Gambling Harms among Monthly Gamblers in the Online Panel Surveys

Gambling and problem gambling exist on a continuum that stretches from non-gambling, at one end to problem gambling, at the other end. Problem gambling is associated with a range of physical and emotional health issues, including depression, anxiety, suicidal ideation, substance use and addiction (Cowlshaw & Hakes, 2015; Hodgins & el-Guebaly, 2009; Lorains, Cowlshaw, & Thomas, 2011; Petry, 2005). While most of these consequences are associated with problem gambling, there is research showing that heavy gambling is also associated with harm in individuals who would not meet criteria for the clinical entity (e.g., Afifi, Cox, Martens, Sareen, & Enns, 2010; Browne et al., 2017).

Until recently, gambling harms were identified solely with the clinical entity of problem gambling. The assumption underlying this approach was that gambling harm could be minimized by treating individuals with this condition or by preventing people from progressing to this state. In the past decade, however, a broader view of the impacts of gambling has emerged internationally with a shift in focus from problem gambling to ‘gambling-related harm’ (Abbott et al., 2018; Browne et al., 2017; Langham et al., 2016; Shannon, Anjou, & Blaszczyński, 2017; Wardle et al., 2024). This approach recognizes that there are many more people harmed by gambling than reflected in the rates of problem gambling alone.¹⁰

Table 10 presents information about the proportion of monthly gamblers in the online panels who experienced different types of gambling-related harm. The types of gambling-related harm assessed by the PPGM and PGM include financial harms, harms to physical health, emotional or psychological harms, harms to family or relationships, work or school-related harms and harms related to illegal activity due to gambling.

¹⁰ The SEIGMA team has published two reports on gambling harms in Massachusetts. In the first report, we focused on identifying gambling harms reported by key demographic groups in the population and without regard to the prevalence of problem gambling within these groups (Volberg, Evans, Zorn, & Williams, 2020). In the second report, we sought to determine whether the ‘Prevention Paradox’ applied in Massachusetts by assessing the extent to which different types of harm were concentrated in higher risk groups (Volberg et al., 2021).

Table 10 Gambling harms among monthly gamblers in MA online panels (unweighted)

	FOPS 2022			OPS 2023			OPS 2024 Spring			OPS 2024 Fall		
	N	%	95% CI	N	%	95% CI	N	%	95% CI	N	%	95% CI
Financial	293	18.0	(16.2, 19.9)	385	20.6	(18.9, 22.5)	397	20.7	(19.0, 22.6)	395	25.0	(23.0, 27.2)
Health	124	7.6	(6.4, 9.0)	188	10.1	(8.8, 11.5)	173	9.0	(7.8, 10.4)	186	11.8	(10.3, 13.5)
Emotion/psychological	295	18.1	(16.3, 20.0)	343	18.4	(16.7, 20.2)	365	19.1	(17.4, 20.9)	345	21.9	(19.9, 24.0)
Family/relationships	227	13.9	(12.3, 15.7)	332	17.8	(16.1, 19.6)	453	23.6	(21.8, 25.6)	429	27.2	(25.1, 29.5)
Work/school	163	10.0	(8.6, 11.5)	231	12.4	(11.0, 14.0)	205	10.7	(9.4, 12.2)	208	13.2	(11.6, 15.0)
Illegal	135	8.3	(7.0, 9.7)	162	8.7	(7.5, 10.0)	163	8.5	(7.3, 9.8)	158	10.0	(8.6, 11.6)

Table 10 shows the proportion of monthly gamblers in the online panels endorsing items indicating different types of gambling-related harm across the four surveys. There was a significant rise between 2022 and 2023 and another significant rise between 2023 and Spring 2024 in the proportion of panelists endorsing family or relationship harms. Rates of financial harms, health harms, family or relationship harms, and work or school harms among monthly gamblers in the online panels were significantly higher in Fall 2024 compared to 2022.

Discussion

This is the second report on results of a series of online panel surveys carried out in Massachusetts. As we noted in the first report (Volberg et al., 2024), while population surveys are an important component of public health monitoring, there is much that can be learned using alternate research strategies in conjunction with or instead of population surveys. While alternate methods have limitations, these can be addressed using triangulation to arrive at more robust assessments of the distribution and determinants of disease. Such systems are used internationally to enhance surveillance of tobacco, alcohol and illicit drug use (Andresen-Streichert, Müller, Glahn, Skopp, & Sterneck, 2018; Castiglioni, Senta, Borsott, Davoli, & Zuccato, 2015; Descheemaeker, Spruyt, & Hermans, 2014; Hickman, Taylor, Chatterjee, & al, 2002).

Population surveys of gambling participation and gambling problems have become increasingly expensive and complex. In this report, we have focused on the utility of using online panel surveys as a means to identify potential changes in gambling attitudes, behaviors and harms among a non-representative sample of monthly gamblers in Massachusetts on a regular and affordable basis. While online panels are not representative of the population, individuals who participate in such surveys provide a much greater ‘yield’ of individuals with characteristics of the greatest concern to policymakers, regulators, and others seeking to minimize and mitigate gambling harm.

Based on the results of four online panel surveys carried out in Massachusetts between 2022 and 2024, we found that the proportion of monthly gamblers who believe that the harm of gambling outweighs the benefits was higher in 2023 than in 2022 and rose again in the Fall 2024 survey. Monthly gamblers in 2023 and 2024 were less likely than monthly gamblers in 2022 to believe that all types of gambling should be legal. Finally, monthly gamblers in 2023 and 2024 were more likely than monthly gamblers in 2022 to believe that gambling was too widely available in Massachusetts. In the wake of sports betting legalization, monthly gamblers in the 2023 and 2024 surveys reported less favorable attitudes toward gambling compared to those in 2022.

With respect to gambling participation, the most common pattern in past-year participation in specific types of gambling among monthly gamblers in the online panels was a **rise** from 2022 to 2023 **followed by a decline** in Spring 2024 and **no significant change** in Fall 2024. This was the pattern for five gambling activities, including daily lottery games, raffles, EGMs, casino table games, and private wagering. There were no significant changes in past-year participation in traditional large jackpot lottery games among monthly gamblers in the online panels across the four surveys. For three gambling activities, including any casino gambling, sports betting and online gambling, there was a **rise** in past-year participation between 2022 and 2023 with no significant changes in Spring 2024 or Fall 2024. For bingo, there was a **rise** in past-year participation from 2022 to 2023 **followed by a decline** in Spring 2024 and another **decline** in Fall 2024. Finally, for instant lottery games, there was no significant change in past-year participation between 2022 and 2023 followed by a **decline** in Spring 2024 but no significant change in Fall 2024.

We also identified higher gambling intensity among monthly gamblers in the online panels from 2022 to 2023, including the mean number of types of gambling engaged with in the past year and the maximum number of days gambled. The mean number of gambling formats declined significantly between 2023 and Spring 2024 before rising again in Fall 2024. Following a significant rise from 2022 to 2023, the number of days gambled in

the past year remained steady in 2024. Average gambling expenditures increased between 2022 and 2023 but did not change significantly between 2023 and Fall 2024.

With respect to sports betting behavior, we identified an increase in sports betting participation concentrated particularly among monthly gamblers in the online panels who bet on sports on a monthly or weekly basis. The higher rate of weekly sports betting among monthly gamblers in the online panels was maintained in both of the 2024 panels. There was also a significant rise in the proportion of monthly gamblers who bet on sports on a monthly basis between 2022 and 2023 which was largely maintained in 2024.

Between 2022 and 2023, when legal sports betting became operational in Massachusetts, there was a decline in the rate of social betting among monthly gamblers in the online panels and a rise in the rate of betting with legal land-based sportsbooks in Massachusetts. There was also a rise in sports betting with online sportsbooks in Massachusetts between 2022 and 2023. Both of these changes were maintained in the 2024 panels. Overall, the data suggest that there has been some recapture of illegal sports betting revenues in Massachusetts between 2022 and 2024.

Finally, we identified a rise in the prevalence of problem gambling among monthly gamblers in the online panels between 2022 and 2023 that was maintained in 2024. We further identified a significant rise among monthly gamblers in the online panels in family or relationship harms between 2022 and 2023 followed by another significant rise in Spring 2024. Rates in four of the six harm domains, including financial harms, health harms, family or relationship harms and work or school harms, were significantly higher in Fall 2024 compared to 2022.

Recommendations

- Given rising rates of sports betting frequency, education and harm reduction strategies targeting sports bettors are warranted.
- There is a need for an expansion of responsible gambling tools to support individuals reporting financial harms and/or family or relationship harms.

Future Directions

This is the second in what we anticipate will be a series of brief reports on gambling attitudes, behavior, problems and harms among monthly gamblers in online panels in Massachusetts. These reports will serve as an early warning system to allow for timely efforts at gambling harm minimization and mitigation in the Commonwealth. Going forward, we anticipate carrying out additional investigations focused specifically on the online panels. Likely directions for future analytic work include multivariate analyses comparing recreational, at-risk and problem gamblers to identify predictors of at-risk and problem gambling and identification of the specific types of gambling contributing to experiences of gambling harm in Massachusetts.

We also anticipate collecting data in future online panels to allow us to investigate additional social and economic impacts of sports betting in Massachusetts building on recent scholarly work that has identified relationships between the introduction of sports betting in different states and increases in poor mental health (Couture, Cross, & Wu, 2024) as well as higher rates of intimate partner violence (Matsuzawa & Arnesen, 2024), reductions in household savings and increased credit card debt (Baker, Balthrop, Johnson, Kotter, & Pisciotta, 2024), and increases in bankruptcies, debt collections and loan delinquencies (Hollenbeck, Larsen, & Proserpio, 2024).

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Appendix

Table 11 Demographics of monthly gamblers in MA online panels (unweighted)

		FOPS 2022			OPS 2023			OPS 2024			OPS 2024 Fall			Massachusetts PUMS 2023	
		N ¹	%	SE	N ¹	%	SE	N ¹	%	SE	N ¹	%	SE	%	SE
Gender	Male	884	54.2	1.2	1,085	58.1	1.1	1,048	54.7	1.1	889	56.4	1.2	48.3	0.3
	Female	731	44.8	1.2	769	41.2	1.1	858	44.8	1.1	681	43.2	1.2	51.7	0.3
	Other	6	0.4	0.1	9	0.5	0.2	5	0.3	0.1	3	0.2	0.1	.	.
	Prefer not to answer	10	0.6	0.2	3	0.2	0.1	5	0.3	0.1	4	0.3	0.1	.	.
Age	18-20	48	2.9	0.4	49	2.6	0.4	67	3.5	0.4	69	4.4	0.5	5.2	0.1
	21-24	127	7.8	0.7	159	8.5	0.6	183	9.6	0.7	138	8.8	0.7	6.9	0.1
	25-34	350	21.5	1	453	24.3	1	407	21.2	0.9	333	21.1	1	17	0.2
	35-54	560	34.3	1.2	695	37.2	1.1	688	35.9	1.1	604	38.3	1.2	31.3	0.2
	55-64	239	14.7	0.9	237	12.7	0.8	238	12.4	0.8	183	11.6	0.8	16.6	0.2
	65-79	277	17	0.9	243	13	0.8	293	15.3	0.8	223	14.1	0.9	17.7	0.2
	80+	30	1.8	0.3	30	1.6	0.3	40	2.1	0.3	27	1.7	0.3	5.2	0.1
Ethnicity	Hispanic	222	13.6	0.8	325	17.4	0.9	223	11.6	0.7	266	16.9	0.9	11.7	0.2
	White alone	1,214	74.4	1.1	1,319	70.7	1.1	1,386	72.3	1	1,051	66.6	1.2	69.1	0.3
	Black alone	87	5.3	0.6	90	4.8	0.5	172	9	0.7	152	9.6	0.7	6.3	0.1
	Asian alone	55	3.4	0.4	69	3.7	0.4	70	3.7	0.4	50	3.2	0.4	7.4	0.1
	Some other race alone	14	0.9	0.2	19	1	0.2	22	1.1	0.2	19	1.2	0.3	1.3	0.1
	Two or more races	39	2.4	0.4	44	2.4	0.4	43	2.2	0.3	39	2.5	0.4	4.1	0.1
Education	Less than high school	40	2.5	0.4	43	2.3	0.3	43	2.2	0.3	59	3.7	0.5	8.7	0.2
	HS or GED	412	25.3	1.1	324	17.4	0.9	462	24.1	1	407	25.8	1.1	23.7	0.2
	Some college	539	33	1.2	624	33.4	1.1	626	32.7	1.1	554	35.1	1.2	22.9	0.2
	BA	444	27.2	1.1	594	31.8	1.1	499	26	1	352	22.3	1	24.7	0.2
	Graduate or professional degree	196	12	0.8	281	15.1	0.8	286	14.9	0.8	205	13	0.8	20	0.2

		FOPS 2022			OPS 2023			OPS 2024			OPS 2024 Fall			Massachusetts PUMS 2023	
		N ¹	%	SE	N ¹	%	SE	N ¹	%	SE	N ¹	%	SE	%	SE
Income	Less than \$15,000	144	8.8	0.7	114	6.1	0.6	120	6.3	0.6	145	9.2	0.7	5.3	0.1
	\$15,000 - <\$30,000	186	11.4	0.8	150	8	0.6	203	10.6	0.7	175	11.1	0.8	5.9	0.1
	\$30,000 - <\$50,000	292	17.9	0.9	222	11.9	0.7	231	12.1	0.7	250	15.9	0.9	7.8	0.1
	\$50,000 - <\$100,000	511	31.3	1.1	591	31.7	1.1	675	35.2	1.1	515	32.7	1.2	21.6	0.2
	\$100,000 - <\$150,000	288	17.7	0.9	467	25	1	342	17.8	0.9	276	17.5	1	19.4	0.2
	\$150,000 or more	126	7.7	0.7	251	13.5	0.8	246	12.8	0.8	163	10.3	0.8	40	0.3
	Prefer not to answer	84	5.2	0.5	71	3.8	0.4	99	5.2	0.5	53	3.4	0.5	.	.

¹ Unweighted N refers to the total number of respondents who answered this question

² Source: U.S. Census Bureau, 2023 American Community Survey PUMS

Table 12 Attitudes about gambling among monthly gamblers in MA online panels (unweighted)

		FOPS 2022			OPS 2023			OPS 2024 Spring			OPS 2024 Fall		
		N	%	95% CI	N	%	95% CI	N	%	95% CI	N	%	95% CI
Belief about benefit or harm that gambling has on society	The harm outweighs the benefits	783	48	(45.6, 50.4)	983	52.7	(50.4, 54.9)	1021	53.3	(51.0, 55.5)	881	55.9	(53.4, 58.3)
	The harm equals the benefits	611	37.5	(35.1, 39.8)	616	33	(30.9, 35.2)	639	33.4	(31.3, 35.5)	493	31.3	(29.0, 33.6)
	The benefits outweigh the harm	237	14.5	(12.9, 16.3)	267	14.3	(12.8, 16.0)	256	13.4	(11.9, 15.0)	203	12.9	(11.3, 14.6)
Opinion about legalized gambling	All types of gambling should be legal	607	37.2	(34.9, 39.6)	577	30.9	(28.9, 33.1)	571	29.8	(27.8, 31.9)	477	30.2	(28.0, 32.6)
	Some types of gambling should be legal and some should be illegal	925	56.7	(54.3, 59.1)	1168	62.6	(60.4, 64.8)	1197	62.5	(60.3, 64.6)	961	60.9	(58.5, 63.3)
	All types of gambling should be illegal	99	6.1	(5.0, 7.3)	121	6.5	(5.5, 7.7)	148	7.7	(6.6, 9.0)	139	8.8	(7.5, 10.3)
Opinion about gambling opportunities in MA	Gambling is too widely available	381	23.4	(21.4, 25.5)	606	32.5	(30.4, 34.6)	671	35	(32.9, 37.2)	554	35.1	(32.8, 37.5)
	Gambling is not available enough	451	27.7	(25.5, 29.9)	360	19.3	(17.6, 21.1)	294	15.3	(13.8, 17.0)	307	19.5	(17.6, 21.5)
	The current availability of gambling is fine	799	49	(46.6, 51.4)	900	48.2	(46.0, 50.5)	951	49.6	(47.4, 51.9)	716	45.4	(43.0, 47.9)

Table 13 Past-year gambling participation among monthly gamblers in MA online panels (unweighted)¹¹

	FOPS 2022			OPS2023			OPS2024 Spring			OPS2024 Fall		
	N	%	95% CI	N	%	95% CI	N	%	95% CI	N	%	95% CI
All gambling	1631	100	(. , .)	1866	100	(. , .)	1968	100	(. , .)	1688	100	(. , .)
All lottery	1506	92.3	(90.9, 93.5)	1751	93.8	(92.7, 94.8)	1822	92.4	(91.2, 93.5)	1557	91.7	(90.2, 93.0)
Traditional	1436	88.0	(86.4, 89.5)	1675	89.8	(88.3, 91.1)	1740	88.3	(86.8, 89.7)	1475	86.9	(85.2, 88.5)
Instant games	1135	69.6	(67.3, 71.8)	1357	72.7	(70.7, 74.7)	1330	67.5	(65.4, 69.6)	1162	68.7	(66.3, 70.9)
Daily games	937	57.4	(55.0, 59.8)	1237	66.3	(64.1, 68.4)	1151	58.8	(56.5, 61.0)	1046	62.2	(59.8, 64.6)
Raffles	619	38.0	(35.6, 40.3)	1012	54.2	(52.0, 56.5)	874	44.5	(42.3, 46.8)	820	49.1	(46.7, 51.6)
Any casino type	692	42.4	(40.0, 44.8)	1045	56.0	(53.7, 58.2)	1011	51.8	(49.5, 54.0)	896	54.1	(51.6, 56.5)
Online casino only				32	1.7	(1.2, 2.4)	36	1.9	(1.4, 2.5)	31	1.8	(1.2, 2.6)
EGMs	581	35.6	(33.3, 38.0)	935	50.1	(47.8, 52.4)	872	44.6	(42.4, 46.9)	798	48.2	(45.7, 50.7)
Table games	462	28.3	(26.2, 30.6)	807	43.2	(41.0, 45.5)	732	37.5	(35.4, 39.7)	659	39.9	(37.5, 42.3)
Sports betting	629	38.6	(36.2, 41.0)	1014	54.3	(52.1, 56.6)	973	49.8	(47.6, 52.1)	887	53.3	(50.9, 55.8)
Private wagering	487	29.9	(27.7, 32.1)	835	44.7	(42.5, 47.0)	712	36.5	(34.4, 38.7)	667	40.3	(37.9, 42.8)
Horse racing	302	18.5	(16.7, 20.5)	694	37.2	(35.0, 39.4)	505	25.8	(23.9, 27.8)	493	29.9	(27.7, 32.2)
Bingo	510	31.3	(29.1, 33.6)	918	49.2	(46.9, 51.5)	763	39.3	(37.1, 41.5)	729	44.5	(42.1, 47.0)
Online	411	25.2	(23.1, 27.4)	714	38.3	(36.1, 40.5)	739	37.6	(35.4, 39.8)	679	41.0	(38.6, 43.4)

Table 14 Statistically significant differences in Table 13

	2023 higher than 2022	Spring 2024 higher than 2022	Spring 2024 lower than 2023	Fall 2024 higher than 2022	Fall 2024 lower than 2023	Fall 2024 lower than Spring 2024
Traditional						
Instant games			*			
Daily games	*		*			
Raffles	*	*	*	*	*	
Any casino type	*	*		*		
EGMs	*	*	*	*		
Table games	*	*	*	*		
Sports betting	*	*		*		
Private wagering	*	*	*	*		
Horse racing	*	*	*	*	*	
Bingo	*	*	*	*	*	*
Online	*	*		*		

Note: Asterisks indicate non-overlapping confidence intervals.

¹¹ Beginning in 2022, online panelists were asked about **electronic gambling machines** and **casino table games** separately but without limiting these activities to land-based venues.

Table 15 Past-year gambling participation among whole sample in MA online panels (unweighted)

	FOPS 2022			OPS2023			OPS2024 Spring			OPS2024 Fall		
	N	%	95% CI	N	%	95% CI	N	%	95% CI	N	%	95% CI
All gambling	2384	78.5	(77.0, 79.9)	2633	81.9	(80.5, 83.2)	2689	83.0	(81.6, 84.2)	2277	81.1	(79.7, 82.6)
All lottery	2098	69.1	(67.4, 70.7)	2348	73.0	(71.5, 74.5)	2336	72.1	(70.5, 73.6)	1957	69.7	(68.0, 71.4)
Traditional	1972	64.9	(63.2, 66.6)	2222	69.1	(67.5, 70.7)	2213	68.3	(66.7, 69.9)	1837	65.5	(63.7, 67.2)
Instant games	1433	47.2	(45.4, 48.9)	1643	51.1	(49.4, 52.8)	1551	47.9	(46.1, 49.6)	1335	47.6	(45.7, 49.4)
Daily games	1109	36.5	(34.8, 38.2)	1402	43.6	(41.9, 45.3)	1267	39.1	(37.4, 40.8)	1149	40.9	(39.1, 42.8)
Raffles	823	27.1	(25.5, 28.7)	1243	38.7	(37.0, 40.4)	1082	33.4	(31.8, 35.0)	1010	36.0	(34.2, 37.8)
Any casino type	828	27.3	(25.7, 28.9)	1180	36.7	(35.1, 38.4)	1142	35.2	(33.6, 36.9)	981	35.0	(33.2, 36.7)
Online casino only				39	1.2	(0.9, 1.7)	46	1.4	(1.1, 1.9)	36	1.3	(0.9, 1.8)
EGMs				220	6.8	(6.0, 7.8)	399	12.3	(11.2, 13.5)	307	10.9	(9.8, 12.2)
Table games	693	22.8	(21.4, 24.3)	1039	32.3	(30.7, 34.0)	976	30.1	(28.6, 31.7)	871	31.0	(29.4, 32.8)
Sports betting	506	16.7	(15.4, 18.0)	864	26.9	(25.4, 28.4)	773	23.9	(22.4, 25.3)	670	23.9	(22.3, 25.5)
Private wagering	723	23.8	(22.3, 25.3)	1107	34.4	(32.8, 36.1)	1065	32.9	(31.3, 34.5)	922	32.9	(31.1, 34.6)
Horse racing	562	18.5	(17.2, 19.9)	911	28.3	(26.8, 29.9)	778	24.0	(22.6, 25.5)	711	25.3	(23.8, 27.0)
Bingo	321	10.6	(9.5, 11.7)	715	22.2	(20.8, 23.7)	525	16.2	(15.0, 17.5)	497	17.7	(16.3, 19.2)
Online	579	19.1	(17.7, 20.5)	1021	31.8	(30.2, 33.4)	882	27.2	(25.7, 28.8)	817	29.1	(27.5, 30.8)

Table 16 PPGM prevalence among monthly gamblers in MA online panels (unweighted)

	FOPS 2022			OPS 2023			OPS 2024 Spring			OPS 2024 Fall		
	N	%	95% CI	N	%	95% CI	N	%	95% CI	N	%	95% CI
Total	1631	100	(,)	1866	100	(,)	1916	100	(,)	1577	100	(,)
Recreational gambler	888	54.4	(52.0,56.9)	921	49.4	(47.1,51.6)	992	51.8	(49.5,54.0)	742	47.1	(44.6,49.5)
At-risk gambler	402	24.6	(22.6,26.8)	467	25.0	(23.1,27.0)	481	25.1	(23.2,27.1)	399	25.3	(23.2,27.5)
Problem or pathological gambler	341	20.9	(19.0,23.0)	478	25.6	(23.7,27.6)	443	23.1	(21.3,25.1)	436	27.6	(25.5,29.9)

Current Trends in Gambling, Sports Betting and Problem Gambling in Massachusetts, 2022-2024

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Overview

- Panel survey methods
 - Focus on regular/monthly gamblers
- Attitudes about gambling
- Gambling behavior
- Gambling problems and harms
- Discussion and future directions

Background

- Online panel surveys
 - Not representative
 - High proportion of regular gamblers, gamblers experiencing problems
 - “It’s a feature, not a bug”
 - Useful to regularly monitor direction of changes at relatively low cost
 - Different people in each survey
- Allows for timely introduction of protective, mitigation measures

SEIGMA Surveys

Survey	Sample Size	Year
Baseline General Population Survey (BGPS)(BTS-E)	9,578	2013-2014
Baseline Online Panel Survey (BOPS)	5,046	2013-2014
Baseline Targeted Surveys (Plainville, Springfield) (BTS-P, BTP-S)	~1,000 each	2014, 2015
Follow-up Targeted Surveys (Plainville, Springfield) (FTS-P, FTS-S)	~1,000 each	2016, 2019
Follow-up General Population Survey (FGPS)(FTS-E)	6,293	2021-2022
Follow-up Online Panel Survey (FOPS)	3,038	2022
Online Panel Survey 2023 (OPS23)	3,380	2023
Online Panel Survey 2024-Spring (OPS24-S)	3,383	2024
Online Panel Survey 2024-Fall (OPS24-F)	3,045	2024
MA Gambling Impact Cohort (MAGIC) – 5 waves	3,139	2013-2019

Methods

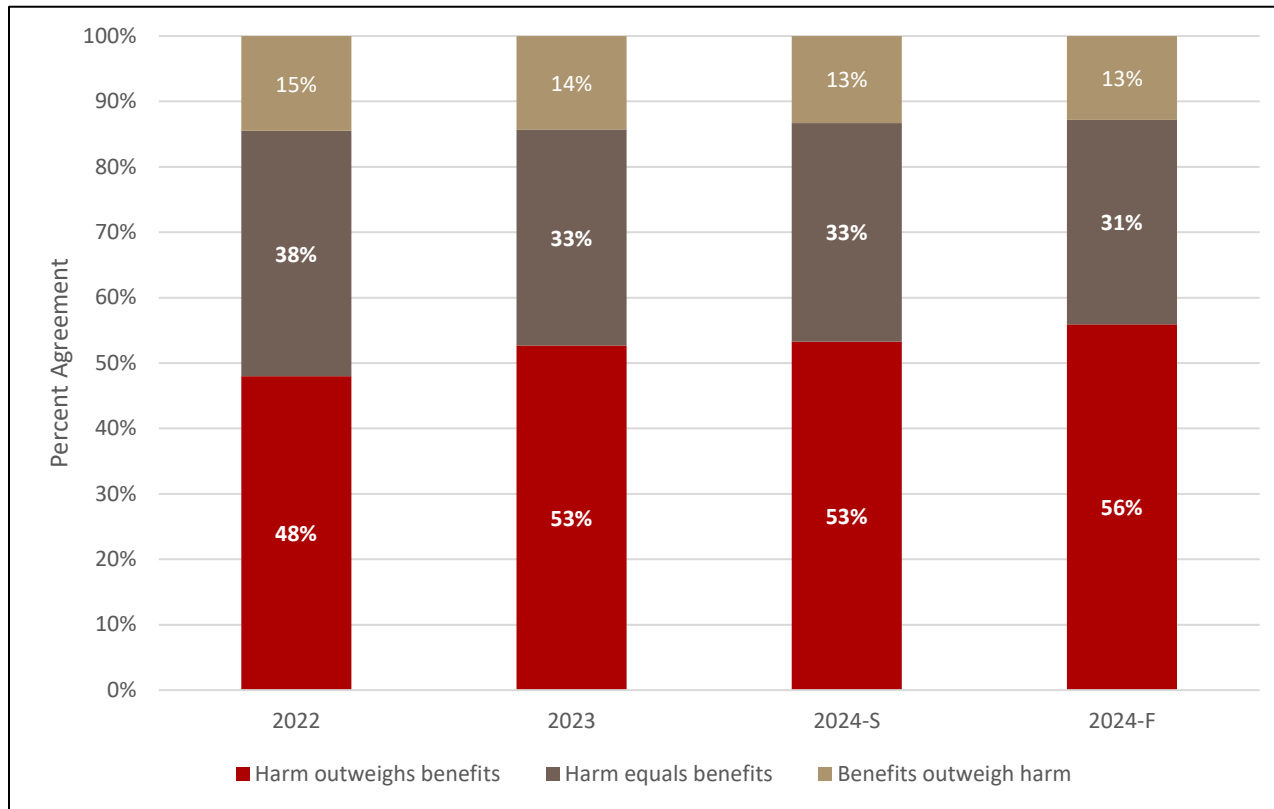
- Questionnaire
 - Aligned closely with questionnaire used in population surveys
 - Described as gambling survey since purpose was to recruit gamblers
 - Sections included
 - Physical & mental health, alcohol & drug use
 - Gambling attitudes
 - Gambling behavior
 - Gambling problems and harms
 - Awareness of services
- Data collection
 - Surveys carried out by Qualtrics
 - Over-sample of young adults (18-34) obtained

Panel Samples for Analysis

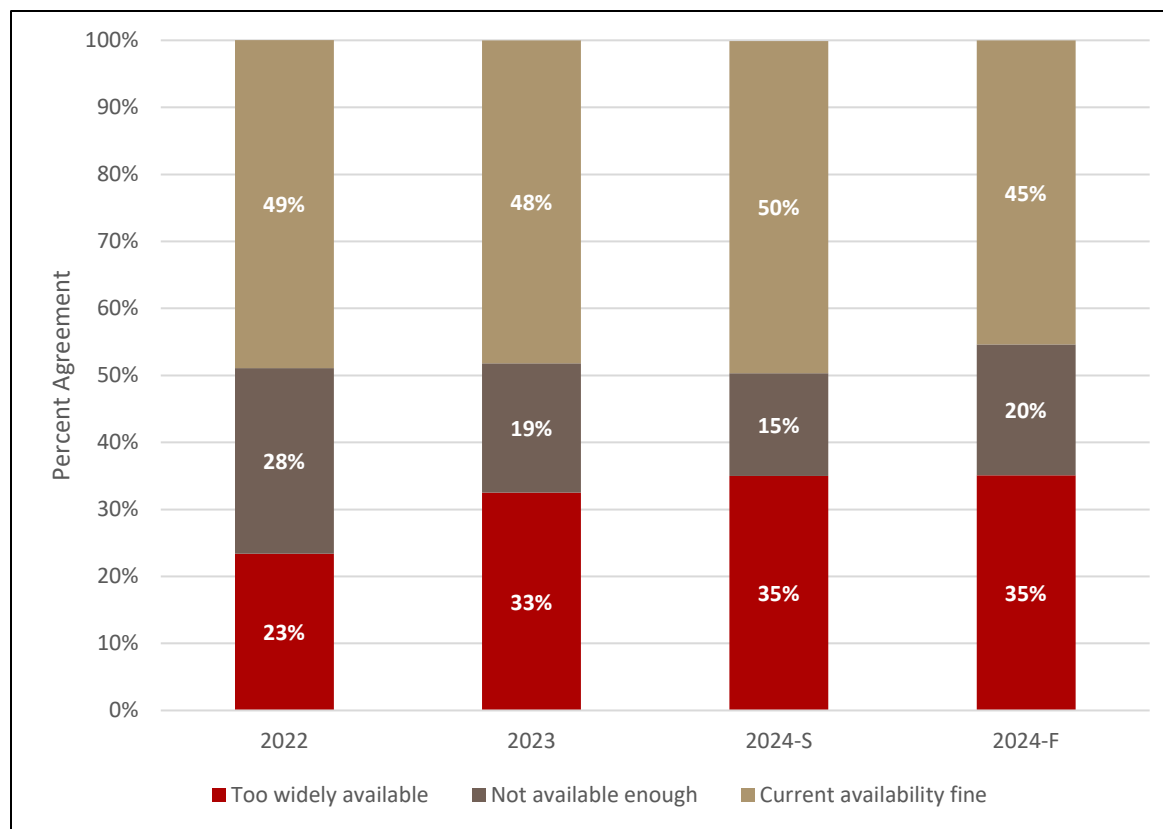
Online Panel	Overall Sample	After Removing Duplicates	%	Gambled Monthly or More	%
FOPS 2022	3038	3038	100	1631	53.7
OPS23 2023	3380	3215	95 .1	1866	58.0
OPS24 Spring	3383	3241	95.8	1916	59.1
OPS24 Fall	3045	2806	92.1	1577	56.2

ATTITUDES TOWARD GAMBLING

Attitudes: Benefits and Harms



Attitudes: Availability



GAMBLING BEHAVIOR

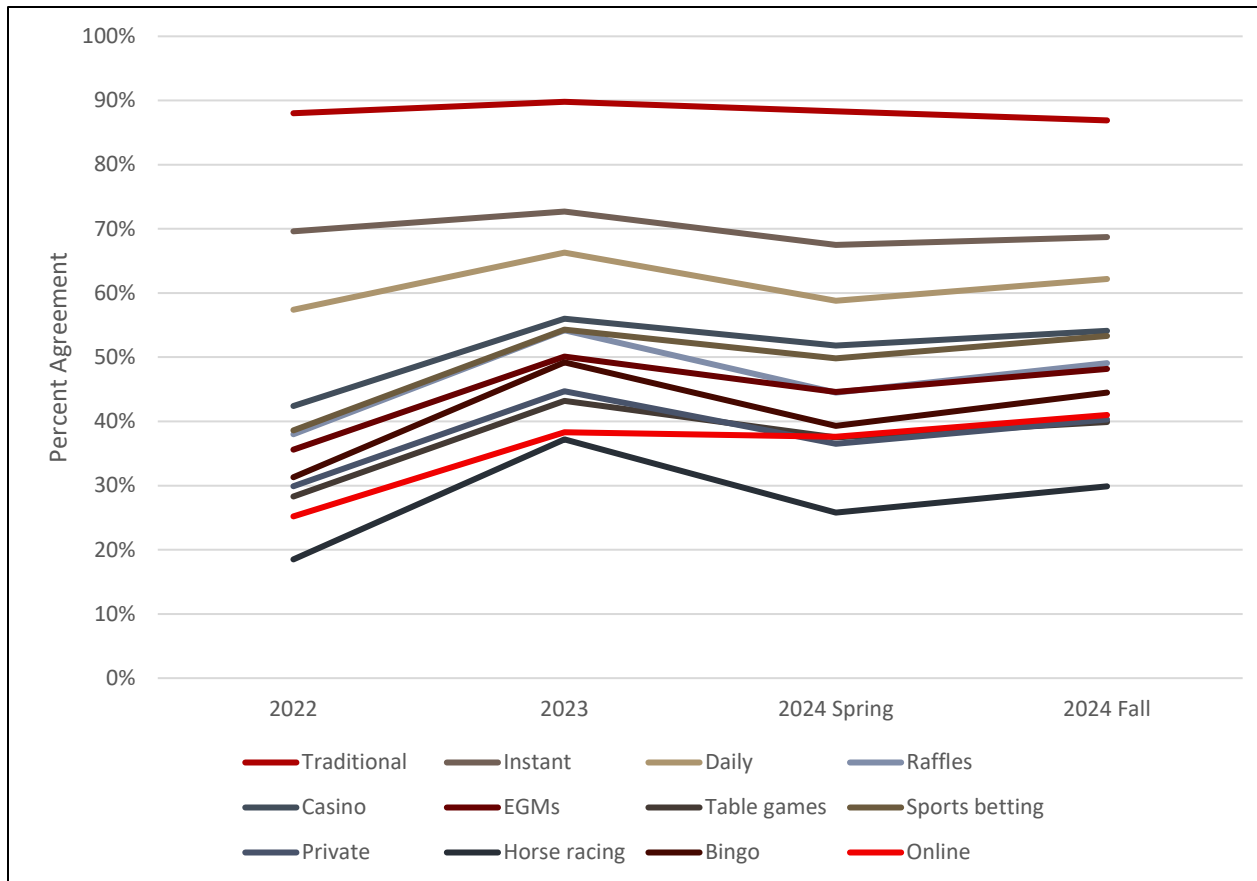
Gambling Participation

- Definition provided for consistency:

We define gambling as betting money or material goods on an event with an uncertain outcome in the hopes of winning additional money or material goods. It includes things such as lottery tickets, scratch tickets, bingo, betting against a friend on a game of skill or chance, betting on horse racing or sports, investing in high risk stocks, etc.

- 13 activities assessed
 - Past-year participation
 - Frequency of participation
 - Expenditures

Gambling Participation



Gambling Intensity

	FOPS 2022			OPS2023			OPS2024 Spring			OPS2024 Fall		
	n	mean	95% CI	n	mean	95% CI	n	mean	95% CI	n	mean	95% CI
# gambling formats	1631	4.6	(4.5, 4.7)	1866	6.0	(5.8, 6.2)	1916	5.3	(5.2, 5.4)	1577	5.6	(5.5, 5.8)
Highest frequency of days/year	1631	103	(98.2, 107.9)	1866	112.6	(108.1, 117.0)	1916	108.8	(104.3, 113.3)	1577	113.1	(108.1, 118.1)
	FOPS 2022			OPS2023			OPS2024 Spring			OPS2024 Fall		
	n	median	95% CI	n	median	95% CI	n	median	95% CI	n	median	95% CI
Gambling expenditures	784	\$1044	(\$700, \$1387)	1866	\$2910	(\$2282, \$3538)	1916	\$2220	(\$1653, \$2787)	1577	\$2280	\$1704, \$2857)

SPORTS BETTING

Sports Betting: Frequency & Activities

		FOPS 2022		OPS2023		OPS2024 Spring		OPS2024 Fall	
		%	95% CI	%	95% CI	%	95% CI	%	95% CI
Frequency of sports betting	1=never	61.4	(59.0, 63.8)	45.7	(43.4, 47.9)	50.2	(47.9, 52.4)	46.7	(44.2, 49.1)
	2=at least yearly	6.9	(5.7, 8.2)	6.8	(5.7, 8.0)	8.4	(7.2, 9.7)	7.9	(6.6, 9.3)
	3=at least monthly	12.8	(11.3, 14.5)	19.2	(17.5, 21.0)	16.0	(14.4, 17.7)	19.2	(17.3, 21.2)
	4=at least weekly	18.9	(17.1, 20.9)	28.3	(26.3, 30.4)	25.5	(23.6, 27.5)	26.3	(24.2, 28.5)
Type of sports betting engaged in	Professional sporting events	60.4	(56.5, 64.2)	61.9	(58.9, 64.9)	64.7	(61.6, 67.7)	61.1	(57.8, 64.4)
	Sports parlays	36.9	(33.2, 40.7)	51.2	(48.1, 54.3)	49.3	(46.2, 52.5)	50.2	(46.8, 53.6)
	Fantasy sports betting	32.4	(28.9, 36.2)	34.6	(31.7, 37.6)	29.2	(26.4, 32.2)	28.5	(25.6, 31.7)
	Betting on sports you participated in	11.8	(9.5, 14.5)	13.2	(11.3, 15.4)	12.5	(10.5, 14.7)	12.5	(10.4, 14.9)

Legal and Illegal Sports Betting

		FOPS 2022		OPS 2023		OPS 2024 Spring		OPS 2024 Fall	
		%	95% CI	%	95% CI	%	95% CI	%	95% CI
Where and how bet on sports	Office sports polls or social betting against friends/family	49.3	(45.4, 53.2)	33.6	(30.8, 36.6)	36.6	(33.6, 39.8)	32.2	(29.1, 35.3)
	Legal land-based sportsbook outside MA	29.3	(25.8, 32.9)	31.8	(29.0, 34.7)	26.7	(24.0, 29.6)	32.3	(29.3, 35.3)
	Legal land-based sportsbook in MA	22.6	(19.5, 26.0)	42.6	(39.6, 45.7)	35.9	(32.9, 39.0)	36.0	(32.8, 39.2)
	Illegal/underground land based sportsbook or bookmaker in MA	16.9	(14.1, 20.0)	19.6	(17.3, 22.2)	13.6	(11.6, 15.9)	16.3	(13.9, 18.7)
	Sports event with online sportsbook outside MA	22.4	(19.3, 25.8)	16	(13.8, 18.4)	20.9	(18.5, 23.6)	20.5	(17.9, 23.1)
	Sports event with online sportsbook in MA	11.4	(9.2, 14.2)	26.6	(24.0, 29.4)	30.3	(27.4, 33.3)	26.9	(24.0, 30.0)

¹ Percentages and 95% CI are calculated using the unweighted N

Sports Betting Recapture

	FOPS 2022		OPS 2023		OPS 2024 Spring		OPS 2024 Fall	
	%	95% CI	%	95% CI	%	95% CI	%	95% CI
Only legal sports betting	66.1	(62.3, 69.7)	68.1	(65.2, 70.9)	69.6	(66.6, 72.5)	67.4	(64.2, 70.6)
Any illegal sports betting	33.9	(30.3, 37.7)	31.9	(29.1, 34.8)	30.4	(27.5, 33.4)	32.6	(29.5, 35.7)
Only illegal sports betting	13.5	(11.1, 16.4)	6.8	(5.4, 8.5)	7.3	(5.8, 9.2)	8.3	(6.6, 10.0)
Any sports betting leakage	54.5	(50.6, 58.4)	51.2	(48.1, 54.3)	47.7	(44.6, 50.9)	53.5	(50.1, 56.9)
If MA had not legalized sports betting, would you have spent the money that you spent gambling on sports at sportsbooks in other states or countries (on-line or in person)			53.0	(47.0, 58.9)	45.0	(40.9, 49.2)	49.7	(45.2, 54.2)

GAMBLING PROBLEMS & HARMS

Problem Gambling - PPGM

Category	Classification criteria
Non-Gambler	Has not gambled in the past 12 months
Recreational Gambler	Has gambled in past 12 months Total score 0
At-Risk Gambler	Total score 1+ Does not meet criteria for more severe categories OR Gambling frequency and expenditure \geq PG median
Problem Gambler	Has gambled at least once a month in past 12 months Impaired Control score 1+ Problems score 1+ Total score of 2-4 OR Total score 3+ Gambling frequency and expenditure \geq PG median
Pathological Gambler (equivalent to severe problem gambler)	Has gambled at least once a month in past 12 months Impaired Control score 1+ Problems score 1+ AND Total score of 5+

Problem Gambling - PGM

Category	Classification criteria
Non-Gambling	Has not gambled in the past 12 months
Recreational Gambling	Has gambled in past 12 months Total score 0
At-Risk Gambling	Does not meet criteria for Problem Gambling Total score 1+ <ol style="list-style-type: none"> 1. Total PGM score: 0 = 0; 1-2 = 2; 3+ = 5 2. Score on PGM15: 0 = 0; 1 = 2 3. Number of types of gambling monthly: 0-2 = 0; 3-4 = 1; 5+ = 4 4. Largest amount lost in single day: <\$200 = 0; \$200-\$499 = 1; \$500+ = 3 5. Importance of gambling as recreational activity: not very important = 0; somewhat important = 1; quite/very important = 2
Moderate At-Risk	Total score 1+ (13% likely to transition to PG one year later)
High At-Risk	Total score 4+ (28% likely to transition to PG one year later)
Very High At-Risk	Total score 8+ (43% likely to transition to PG one year later)
Problem Gambling	Has gambled at least once a month in past 12 months Impaired Control score 1+ Problems score 1+ Total score of 2+ with score of 7+ predictive of continued PG in next 12 months OR Total score 3+ Gambling frequency and expenditure ≥ PG median

Problem Gambling

	FOPS 2022			OPS 2023			OPS 2024 Spring			OPS 2024 Fall		
	N	%	95% CI	N	%	95% CI	N	%	95% CI	N	%	95% CI
Total	1631	100 (,)		1866	100 (,)		1916	100 (,)		1577	100 (,)	
Recreational gambler	888	54.4 (52.0,56.9)		921	49.4 (47.1,51.6)		580	30.3 (28.3,32.4)		462	29.3 (27.1,31.6)	
At-risk gambler	402	24.6 (22.6,26.8)		467	25.0 (23.1,27.0)							
At-risk gambler-Moderate							505	26.4 (24.4,28.4)		395	25.0 (23.0,27.2)	
At-risk gambler-High/Very high							386	20.1(18.4,22.0)		278	17.6 (15.8,19.6)	
Problem or pathological gambler	341	20.9 (19.0,23.0)		478	25.6 (23.7,27.6)		445	23.2 (21.4,25.2)		442	28.0 (25.9,30.3)	

Gambling Harms

	FOPS 2022			OPS 2023			OPS 2024 Spring			OPS 2024 Fall		
	N	%	95% CI	N	%	95% CI	N	%	95% CI	N	%	95% CI
Financial	293	18.0	(16.2, 19.9)	385	20.6	(18.9, 22.5)	397	20.7	(19.0, 22.6)	395	25.0	(23.0, 27.2)
Health	124	7.6	(6.4, 9.0)	188	10.1	(8.8, 11.5)	173	9.0	(7.8, 10.4)	186	11.8	(10.3, 13.5)
Emotion/psychological	295	18.1	(16.3, 20.0)	343	18.4	(16.7, 20.2)	365	19.1	(17.4, 20.9)	345	21.9	(19.9, 24.0)
Family/relationships	227	13.9	(12.3, 15.7)	332	17.8	(16.1, 19.6)	453	23.6	(21.8, 25.6)	429	27.2	(25.1, 29.5)
Work/school	163	10.0	(8.6, 11.5)	231	12.4	(11.0, 14.0)	205	10.7	(9.4, 12.2)	208	13.2	(11.6, 15.0)
Illegal	135	8.3	(7.0, 9.7)	162	8.7	(7.5, 10.0)	163	8.5	(7.3, 9.8)	158	10.0	(8.6, 11.6)

Discussion

- Online panels are not representative of the general population but provide information about the direction of changes among regular (monthly) gamblers
- **Attitudes** about gambling became more negative between 2022 and 2024
- **Participation** in specific types of gambling was most likely to rise from 2022 to 2023 and then stabilize
- Gambling **intensity** rose between 2022 and 2023 and then remained stable in 2024
- The proportion of monthly gamblers **betting weekly on sports** rose between 2022 and 2023 and remained high in 2024
- There appears to have been some **recapture** of illegal sports betting expenditures between 2022 and 2024
- **Problem gambling** prevalence rose between 2022 and 2023 and remained higher in 2024
- Rates of **gambling harm** in 4 of 6 domains were higher in 2024 compared to 2022
 - A rise in **family or relationship harms** between 2022 and 2023 was followed by another rise in 2024

Recommendations

- Given rising rates of sports betting frequency, education and harm reduction strategies targeting sports bettors are warranted.
- There is a need for an expansion of responsible gambling tools to support individuals reporting financial harms and/or family or relationship harms.

Thank you!

For more information:

www.umass.edu/seigma/reports

<https://massgaming.com/about/research-agenda/>



TO: Chair Jordan Maynard
Commissioner Eileen O'Brien
Commissioner Bradford Hill
Commissioner Nakisha Skinner
Commissioner Paul Brodeur

FROM: Andrew Steffen – Compliance Operations Manager, Sports Wagering

MEMO: 7/11/2025
MEETING: 7/31/2025

RE: Update to Fanatics Betting & Gaming House Rules

REGULATION BACKGROUND:

Pursuant to 205 CMR 247.02(4), a Sports Wagering Operator shall not change or modify the House Rules without prior written approval of the Commission.

EXECUTIVE SUMMARY:

Fanatics Betting & Gaming has requested changes to their Massachusetts online house rules. The changes are a follow-up to the house rules approved during the July 1, 2025, public meeting.

The

- Teasers ~~(Fixed odds parlay betting)~~
 - A teaser is a parlay of at least two legs, where a customer can choose to alter the point spread or total by a fixed amount for each of their selections. ~~In exchange they will receive a fixed minimum price on their parlay, regardless of which games they select, and which side of the original spread or total they choose to tease.~~

Teasers

A teaser bet consists of two or more legs offered at predetermined odds, where a spread or total market is moved to an alternate line. A leg is defined as one or more chosen selections in any individual event market.



Sports Wagering Division

- ~~If one or both legs in a two leg teaser are voided or settled as a push then the bet will be settled as a void.~~
- If one or more legs in any other teaser bet are voided or settled as a push, the teaser will be recalculated and settled at the odds that were offered at the reduced number of legs. ~~If the total legs are reduced to one or less the entire bet will be made void.~~

CONCLUDING STATEMENT:

The Sports Wagering Division confirms all requirements have been met under 205 CMR 247.02 and recommends approving these changes.



TO: Chair Jordan Maynard
Commissioner Eileen O'Brien
Commissioner Brad Hill
Commissioner Nakisha Skinner
Commissioner Paul Brodeur

FROM: Justin Stempeck, Deputy General Counsel
Derek Lennon, Chief Financial and Accounting Officer
Carrie Torrisi, Chief of Sports Wagering Division

DATE: July 21, 2025

RE: Revisions to 205 CMR 239.07

205 CMR 239.07 – “Audit of Operator Operations by Commission” was promulgated prior to the launch of sports wagering in 2023 and in many ways mirrors 205 CMR 139.07 which addresses audit requirements for our gaming licensees. Notably, 205 CMR 139.07 encapsulates a statutory audit requirement from G.L. c. 23K, §65 that requires that each of the three gaming operators be audited every year. That same requirement is not present in the sports wagering statute G.L. c. 23N.

The current version of 205 CMR 239.07 states:

The Commission shall audit on an annual basis, and at other times the Commission, or the Bureau, determines necessary the accounts, programs, activities, and functions of an Operator or any aspect of Sports Wagering Operation and compliance with any provision of the Operator's system of internal controls. To conduct the audit, authorized officers and employees of the Commission shall be given access by the Operator to such accounts at reasonable times and may require the production of books, documents, vouchers and other records relating to any matter within the scope of the audit; provided however, that an Operator's tax returns will not be audited by the Commission. All audits shall be conducted in accordance with generally accepted auditing standards established by the American Institute of Certified Public Accountants and the standards established by the Public Company Accounting Oversight Board. In any audit report of the accounts, funds, programs, activities and functions of an Operator issued by the Commission containing adverse or critical audit results, the Commission may require a response, in writing, to the audit results. Such a response shall be forwarded to the Commission within 15 days of notification by the Commission. Where possible, efforts will be made not to audit areas

that were the subject of, and satisfactorily addressed by, the annual audit required in accordance with 205 CMR 239.06.

Given that there are more than double the number of sports wagering operators than brick and mortar gaming operators there are practical limitations to conducting in-depth audits of all seven sports wagering operators each year. Instead, Legal, Finance and Sports Wagering propose a risk-based approach to our sports wagering auditing requirement that would allow for targeted audits each year based on current industry trends. This would provide flexibility to target all operators annually in a handful of specific areas or to focus on a smaller number of operators and a larger number of areas. Notably, any operator could be kept under audit for multiple years if necessary to resolve ongoing compliance issues.

To achieve this goal, we would propose editing the existing regulation to read:

The Commission shall **have the discretion to** audit on an annual basis, and at other times the Commission, ~~or~~ the Bureau, or the **Sports Wagering Division**, determines necessary the accounts, programs, activities, and functions of an Operator or any aspect of Sports Wagering Operation and compliance with any provision of the Operator's system of internal controls.

This change empowers the Commission to audit all sports wagering operators annually (or not) on a wide variety of different topics as set forth in the remainder of the regulation, which would remain the same.



SMALL BUSINESS IMPACT STATEMENT

The Massachusetts Gaming Commission (“Commission”) hereby files this Small Business Impact Statement in accordance with G.L. c. 30A, §2, relative to the proposed amendments to **205 CMR 239 Continuing disclosure and reporting obligations of sports wagering licensees**, specifically 205 CMR 239.07: Audit of Operator Operations by Commission.

These regulations were promulgated as part of the process of promulgating regulations governing sports wagering in the Commonwealth, and are authorized by G.L. c. 23N, §4. These regulations govern the auditing authority of the Commission over its licensees.

These regulations are unlikely to have an impact on small businesses as they govern the behavior of Sports Wagering Operators who are not small businesses. Under G.L. c.30A, §2, the Commission offers the following responses to the statutory questions:

1. Estimate of the number of small businesses subject to the proposed regulation:

These regulations are unlikely to have an impact on small businesses.

2. State the projected reporting, recordkeeping, and other administrative costs required for compliance with the proposed regulation:

There are no projected reporting, recordkeeping, or other administrative costs required for small businesses to comply with these regulations.

3. State the appropriateness of performance standards versus design standards:

No standards applicable to small businesses are set forth. Provided standards are performance standards.

4. Identify regulations of the promulgating agency, or of another agency or department of the Commonwealth, which may duplicate or conflict with the proposed regulation:

There are no conflicting regulations in 205 CMR, and the Commission is unaware of any conflicting or duplicating regulations of any other agency or department of the Commonwealth.

5. State whether the proposed regulations are likely to deter or encourage the formation of new businesses in the Commonwealth:



Massachusetts Gaming Commission

These amendments are unlikely to have any impact on the formation of new businesses in the Commonwealth.

Massachusetts Gaming Commission
By:

/s/ Justin Stempeck
Justin Stempeck, Deputy General Counsel

Dated: July 21, 2025



Massachusetts Gaming Commission

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Code of Massachusetts Regulations

Title 205: Massachusetts Gaming Commission

Chapter 239.00: Continuing Disclosure and Reporting Obligations of Sports Wagering Licensees (Refs & Annos)

205 CMR 239.07

239.07: Audit of Operator Operations by Commission

Currentness

The Commission shall **have the discretion to** audit on an annual basis, and at other times the Commission, ~~or~~ the Bureau, **or the Sports Wagering Division** determines necessary the accounts, programs, activities, and functions of an Operator or any aspect of Sports Wagering Operation and compliance with any provision of the Operator's system of internal controls. To conduct the audit, authorized officers and employees of the Commission shall be given access by the Operator to such accounts at reasonable times and may require the production of books, documents, vouchers and other records relating to any matter within the scope of the audit; provided however, that an Operator's tax returns will not be audited by the Commission. All audits shall be conducted in accordance with generally accepted auditing standards established by the American Institute of Certified Public Accountants and the standards established by the Public Company Accounting Oversight Board. In any audit report of the accounts, funds, programs, activities and functions of an Operator issued by the Commission containing adverse or critical audit results, the Commission may require a response, in writing, to the audit results. Such a response shall be forwarded to the Commission within 15 days of notification by the Commission. Where possible, efforts will be made not to audit areas that were the subject of, and satisfactorily addressed by, the annual audit required in accordance with [205 CMR 239.06](#).

Credits

History: [1489 Mass. Reg. 51](#), (emergency) eff. Jan. 25, 2023; [1493 Mass. Reg. 55](#), amended eff. Apr. 14, 2023.

The Massachusetts Administrative Code titles are current through Register No. 1551, dated July 4, 2025. Some sections may be more current; see credits for details.

Mass. Regs. Code tit. 205, § 239.07, 205 MA ADC 239.07

End of Document

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TO: Jordan Maynard, Chair
Eileen O'Brien, Commissioner
Bradford Hill, Commissioner
Nakisha Skinner, Commissioner
Paul Brodeur, Commissioner

FROM: Judith A. Young, Associate General Counsel
Alexandra Lightbown, DVM, Director of the Division of Racing

RE: Update to 205 CMR 3.11 and 3.14

DATE: July 31, 2025

Overview:

Code of Massachusetts Regulations ("CMR") Chapter 3.00 sets forward the rules, conditions, procedures under which all Harness Horse Racing shall be conducted in the Commonwealth.

205 CMR 3.11: *General Rules* and 205 CMR 3.14: *Licenses, Registrations and Fees for Participants in Racing*, have been brought forward for promulgation by the Legal Division, in conjunction with the Division of Racing, to increase clarity of the regulations for all racing participants.

Proposed Amendments:

The Legal Division is recommending removal of the term "obnoxious" from 205 CMR 3.11(8) and 205 CMR 3.14 (5)(8) and (9). As a descriptor of conduct, the term does not have broad use or application in many other horse racing jurisdictions. The term "unbecoming" has been recommended as a replacement, as it more broadly encompasses the kind of conduct that may reflect poorly on a licensee or racing participant; and mirrors similar standards in other U.S. racing jurisdictions.

The proposed changes to 205 CMR 3.11(8) and 205 CMR 3.14 (5)(8) and (9) are depicted below:

205 CMR 3.11:

(8) No person shall in any manner, or at any time, disturb the peace, or engage in conduct that is unbecoming ~~or make himself or herself obnoxious~~ on the grounds of the Association.



Massachusetts Gaming Commission

205 CMR 3.14:

(5) Before recommending any application for a license it shall be the duty of the Judges, individually and collectively, to ascertain if the applicant is qualified as to ability, integrity and right to the license applied for. And further, no application for a license shall be recommended by the Judges if the applicant's previous conduct in Massachusetts or elsewhere is considered to have been objectionable, ~~obnoxious~~ unbecoming or detrimental to the best interest of racing.

(8) The Commission may refuse to license any applicant whose previous conduct in Massachusetts or elsewhere in connection with horse racing is considered by the Commission to have been objectionable, ~~obnoxious-unbecoming~~ or detrimental to the best interest of racing.

(9) The Commission may also revoke any license if the holder of the same has violated any rule or regulation of the Commission governing his or her conduct in connection with horse racing, or where such conduct is objectionable, ~~obnoxious~~ unbecoming or detrimental to the best interest of racing.

205 CMR: MASSACHUSETTS GAMING COMMISSION

3.11: General Rules

- (1) The definitions and interpretations of racing terms, heretofore set forth as well as 205 CMR 3.01, are to be considered in connection with 205 CMR 3.00 and as part of 205 CMR 3.00.
- (2) All owners and trainers of horses and their stable employees are subject to M.G.L. c. 128A and 205 CMR 3.00 immediately upon acceptance and occupancy of stabling accommodations from or approved by an Association or upon making entry to run on its track.
- (3) Owners, trainers and stable employees shall abide by M.G.L. c. 128A and 205 CMR 3.00 and accept the decision of the Judges on any and all questions to which their authority extends, subject to their right of appeal to the Commission.
- (4) Every person participating in and every patron of a licensed Race Meeting shall abide by M.G.L. c. 128A and 205 CMR 3.00, and accept the Judges' decisions on any and all questions to which their authority extends, subject to the right of appeal to the Commission.
- (5) Every person who drives a horse on a track licensed by the Commission, whether exercising, warming up or driving in a race shall wear a protective helmet that meets the Safety Standards of *The Association of Racing Commissioners International Model Rules of Racing* version 6.1, July, 2015.
- (6) For the period of two hours before post time of the first race of the day and until the racing program of the day has been completed, every person who drives a horse on a track licensed by the Commission, whether warming up for a race or driving in a race shall wear his or her registered colors, which must be distinguishable at all times.
- (7) No person shall use improper, profane or indecent language to a racing official.
- (8) No person shall in any manner, or at any time, disturb the peace or engage in conduct that is unbecoming or make himself or herself obnoxious on the grounds of the Association.
- (9) Any person, who participates in an unrecognized meeting anywhere, either as a racing official or as an owner, trainer or driver, may be adjudged guilty of conduct detrimental to racing.
- (10) No person or horse ruled off, or under full suspension by the United States Trotting Association shall be admitted to the grounds of any Association.
- (11) No person, other than an official of the Commission, shall be allowed in the Judges' Stand; the space occupied by the Clerk of Course; the Timers Stand; and the space occupied by the Program Director and his or her assistants for the period from ½ hour before post time of the first race of the day until the last race has been declared "official" unless permission is obtained from the Judges for each entry. Associations shall take such steps as are necessary to assist the Judges in carrying out the provisions of 205 CMR 3.11(11).
- (12) Any person who has been convicted by any court anywhere for illegal possession, sale or giving away of narcotics may be ruled off.
- (13) If any owner, trainer, driver, stable employee, or other person solicit bets from the public by correspondence or other methods, to be made on any horse which is to run on a track in Massachusetts, such person or persons shall be ruled off.
- (14) When a person is ruled off a course or suspended, every horse owned in whole or part by him or her shall be ineligible to be entered or to start in any race until said horse has been reinstated either by the rescinding of his or her owner's penalty or his or her transfer through *bona fide* sale to an ownership acceptable to the Judges.
- (15) When a person is suspended by the Judges of the meeting "from driving only" the ruling of the Judges shall state whether or not the person suspended shall have the privilege of the paddock during the period of his or her suspension.
- (16) When a person is ruled off a course or suspended, any horse which is under his or her care, management, training or superintendence shall not be qualified to be entered or to start in any race until said horse has been reinstated by the rescinding of said person's penalty or by the placement of the horse in the hand of a licensed trainer and the approval of the transfer by the Judges.

3.14: Licenses, Registrations and Fees for Participants in Racing

- (1) The following persons shall be required to take out a license from the Commission, and pay the current applicable annual fee: Driver, Trainer, Owner, Authorized Agent, Stable Employees, Veterinarian, Blacksmith, Vendors and Racing Officials.
- (2) The fee shall accompany each application for license or registration. They expire December 31st of the year of issue, except stable employees whose license expire on March 31st.
- (3) All applications for license and registrations to participate in racing shall be made to the Commission on forms supplied by the Commission. Any person making any false or misleading statements on an application for license or registration may be denied such a license or registration or may be assessed a fine, suspension or both. If already in possession of a license, said license may be revoked.
- (4) Such application shall be submitted first to the Judges. In considering each application for a license the Judges may require the applicant, as well as his or her endorsers, to appear before them and show that said applicant is qualified in every respect to receive the license requested. Ability as well as integrity must be clearly shown by the applicant in order to receive the Judges' recommendation for the granting of the license.
- (5) Before recommending any application for a license it shall be the duty of the Judges, individually and collectively, to ascertain if the applicant is qualified as to ability, integrity and right to the license applied for. And further, no application for a license shall be recommended by the Judges if the applicant's previous conduct in Massachusetts or elsewhere is considered to have been objectionable, ~~obnoxious~~-unbecoming or detrimental to the best interest of racing.
- (6) No application for a license or registration shall be recommended by the Judges and no license or registration will be issued by the Commission unless satisfactory evidence first is presented to the Judges that the person so applying will participate in the meeting over which the Judges have supervision.
- (7) The Commission may refuse to license any applicant who has been refused a license by any other State Gaming or Racing Commission, the United States Trotting Association or turf governing body.
- (8) The Commission may refuse to license any applicant whose previous conduct in Massachusetts or elsewhere in connection with horse racing is considered by the Commission to have been objectionable, ~~obnoxious~~-unbecoming or detrimental to the best interest of racing.
- (9) The Commission may also revoke any license if the holder of the same has violated any rule or regulation of the Commission governing his or her conduct in connection with horse racing, or where such conduct is objectionable, ~~obnoxious~~-unbecoming or detrimental to the best interest of racing.
- (10) All licenses granted shall be subject to the conditions set forth in the application therefor and the Commission shall have full discretion to suspend or revoke the same for any infraction of the conditions of the application of license and 205 CMR 3.00.
- (11) No owner, trainer or agent shall start a horse unless all licenses and registrations required by 205 CMR 3.14(1) have been filed. Violators of 205 CMR 3.14(11) may be subject to suspension or a forfeiture.
- (12) No application, except a license for ownership, will be considered for or granted to a person under 16 years of age. If younger than 18 years of age, an applicant for an owner's license shall submit a notarized affidavit from his or her parent or legal guardian stating that the parent or legal guardian assumes responsibility for the applicant's financial, contractual and other obligations relating to the applicant's participation in racing within the Commonwealth of Massachusetts.
- (13) When an ownership is in the name of both husband and wife, both shall be licensed.
- (14) Temporary Owner Licenses may be issued to Trainers acting as agents for their owners or to authorized agents representing their owners. Temporary licenses will be valid for a period of 30 days from date of approval. Every Temporary Owner's License must be followed by an application from the owner received by the Commission prior to the expiration of the 30-day Temporary Owner's License. Failure to do so will result in an imposition by the Judges of a fine against the trainer or

205 CMR: MASSACHUSETTS GAMING COMMISSION

authorized agent. No horse will be allowed to race after the expiration of the Temporary Owner's License until a permanent owner's license is granted.

REGULATORY AUTHORITY

205 CMR 3.00: M.G.L. c. 128A, § 9.



Legal Division

SMALL BUSINESS IMPACT STATEMENT

The Massachusetts Gaming Commission (“Commission”) hereby files this Small Business Impact Statement in accordance with G.L. c. 30A, §2 relative to the proposed amendments to **205 CMR 3.00 Harness Horse Racing**. Specifically, the following sections: **205 CMR 3.11: General Rules and 205 CMR 3.14: Licenses, Registrations and Fees for Participants in Racing**, notice of which was filed with the Secretary of the Commonwealth. These amendments were developed as part of the process of promulgating regulations governing harness horse racing in the Commonwealth. This regulation is authorized by G.L. c. 128A, §§ 9 and 9B.

These amendments apply directly to harness horse licensees conducting or participating in racing in the Commonwealth. Accordingly, these proposed regulations are not likely to have a negative impact on small businesses. In accordance with G.L. c. 30A, § 2, the Commission offers the following responses:

1. Estimate of the number of small businesses subject to the proposed regulation:

To the extent that horsemen and barns are small businesses, they may be marginally impacted by these regulations. However, the Commission does not anticipate that the proposed amendments would impact a greater number of small businesses than the previous amendment.

2. State the projected reporting, recordkeeping and other administrative costs required for compliance with the proposed regulation:

Projected reporting, recordkeeping and other administrative costs are unlikely to change in any material way for compliance with the proposed amendments.

3. State the appropriateness of performance standards versus design standards:

Some of the proposed regulations are performance standards, so as to provide further clarification regarding the responsibilities and prohibitions of anyone licensed by the Massachusetts Gaming Commission to conduct or participate in Harness Horse Racing in the Commonwealth of Massachusetts. Accordingly, performance-based standards were most appropriate here.

4. Identify regulations of the promulgating agency, or of another agency or department of the commonwealth, which may duplicate or conflict with the proposed regulation:

There are no conflicting regulations in 205 CMR, and the Commission is unaware of any conflicting or duplicating regulations of any other agency or department of the Commonwealth.



Massachusetts Gaming Commission

5. State whether the proposed regulation is likely to deter or encourage the formation of new businesses in the commonwealth:

These amendments are unlikely to deter or encourage the formation of new businesses in the Commonwealth at this time.

Massachusetts Gaming Commission
By:

/s/ Judith A. Young
Judith A. Young
Associate General Counsel

Dated: July 31, 2025



Massachusetts Gaming Commission

101 Federal Street, 12th Floor, Boston, Massachusetts 02110 | TEL 617.979.8400 | FAX 617.725.0258 | www.massgaming.com



Memorandum

To: Jordan Maynard, Chair
Commissioner Eileen O'Brien
Commissioner Bradford Hill
Commissioner Nakisha Skinner
Commissioner Paul Brodeur

From: Autumn Birarelli, Staff Attorney
Cc: Justin Stempeck, Interim General Counsel
Re: Proposed Amendment to 205 CMR 248.12
Date: July 24, 2025

205 CMR 248 regulates how funds are able to be withdrawn from a sports wagering account. Certain fund withdrawal methods for sports wagering accounts are not instantaneous dependent upon the method of payment the patron requests. For slower withdrawal methods, such as checks, users have been able to spend down their funds before the withdrawal was fully processed.

This proposed language would be added to 205 CMR 248.12(2):

Upon a request from a patron to withdraw funds from their Sports Wagering Account, the Sports Wagering Operator shall immediately freeze the amount requested and ensure the funds cannot be used for any other purpose until the withdrawal is complete.

The proposed change to 205 CMR 248.12 would require that the sports wagering operators freeze the funds requested by the patron until the withdrawal is complete. This change would ensure that patrons' withdrawal requests are honored. The proposed changes would make the regulation consistent with best practices.

In sum, we are seeking a vote of authorization to begin the promulgation process for this regulation, and approval of the included small business impact statement.



Massachusetts Gaming Commission

205 CMR: MASSACHUSETTS GAMING COMMISSION

205 CMR 248.00: SPORTS WAGERING ACCOUNT MANAGEMENT

Section

- 248.01: General Account Wagering
- 248.02: Account Refusals
- 248.03: Account Registration
- 248.04: Age and Identity Verification
- 248.05: Limitation to One Account per Patron
- 248.06: Terms and Conditions and Privacy Policies
- 248.07: Account Access
- 248.08: Sufficient Account Balance
- 248.09: Financial Transactions
- 248.10 : Account Deposits
- 248.11 : Failed Electronic Funds Transfers (EFTs)
- 248.12 : Account Withdrawals
- 248.13 : Account Adjustments
- 248.14 : Account Credits
- 248.15 : Account Records and Statements
- 248.16 : Responsible Gaming Limits
- 248.17 : Account Suspension and Restoration
- 248.18 : Account Closure
- 248.19 : Abandoned Funds and Dormant Accounts

248.01 : General Account Wagering

- (1) A Sports Wagering Operator may offer a system of account wagering to its patrons whereby Wagers are debited from and pay outs credited to a sum of money, deposited in a Sports Wagering Account by the patron held by the Sports Wagering Operator.
- (2) A Sports Wagering Account may only be established in the name of a patron and is not transferable.
- (3) A Person may only place a Wager through a mobile application or other digital platform using funds from a Sports Wagering Account.
- (4) No Sports Wagering Operator may charge any fee to maintain or administer any Sports Wagering Account.

248.02 : Account Refusals

A Sports Wagering Operator may reserve the right to, at any time, refuse to open a Sports Wagering Account, accept a wager, or accept a deposit. The Sports Wagering Operator shall not establish or maintain an account for any Person who has self-excluded or otherwise been excluded from Sports Wagering pursuant to M.G.L. c. 23N, § 13(e) or 205 CMR.

248.03 : Account Registration

- (1) Any Person registering for a Sports Wagering Account shall provide Personally Identifiable Information to the Sports Wagering Operator. That information shall include, at a minimum, the following:
 - (a) Full legal name;
 - (b) Date of birth;
 - (c) Physical address of the Person's principal residence, which address shall not be a post office box;
 - (d) Social Security Number, or the last four digits of the Social Security Number, or an equivalent Federal Identification Number for a noncitizen patron, such as a passport or taxpayer identification number;
 - (e) A telephone number for the patron; and
 - (f) Any other information sufficient to verify the registrant's identity and to prove the registrant is at least 21 years old.

248.03: continued

- (2) During the registration process, the registrant shall:
 - (a) Not be permitted to register for a Sports Wagering Account if they submit a birth date which indicates that they are younger than 21 years old;
 - (b) Be informed on the account application which information fields are "required," which are not, and the consequences of not filling in the "required" fields;
 - (c) Be required to agree to the terms and conditions and privacy policies of the Sports Wagering Operator;
 - (d) Be required to acknowledge that they are prohibited from allowing any other person to access or use their Sports Wagering Account;
 - (e) Be required to consent to the monitoring and recording of the use of their Sports Wagering Account by the Sports Wagering Operator and the Commission; and
 - (f) Be required to affirm that the Personally Identifiable Information provided in accordance with 205 CMR 248.03(1) is accurate.
- (3) For each Sports Wagering Account, the Sports Wagering Operator must establish and maintain an electronic patron file, which must, at a minimum, include the following for each patron:
 - (a) Unique patron ID and, if different from the patron ID, the patron's username;
 - (b) The information provided in accordance with 205 CMR 248.03(1) to register the patron and create the Sports Wagering Account;
 - (c) The date and method of identity verification, including, where applicable, the document number of the government issued identification credential examined and its date of expiration, if applicable, or, if a government issued identification credential is not required for registration, the electronic record documenting the process used to confirm the patron's identity;
 - (d) The date of the patron's agreements to the terms and conditions and privacy policies, including those in 205 CMR 248.06, and the date of the patron's agreement, acknowledgment, consent, and affirmation in accordance with 205 CMR 248.03(2)(c) through (f);
 - (e) Account details and current balance, including any incentive credits, provided, that all restricted wagering credits and unrestricted funds that may expire shall be maintained separately;
 - (f) The date on, and method by which, the Sports Wagering Account was registered;
 - (g) Every date on, time at which, and IP address from which the Sports Wagering Account is accessed;
 - (h) If the account is active, the debit instrument used to fund the account, the accountholder's name, and whether the debit instrument accountholder's name matches that of the patron, unless impossible; and
 - (i) The current status of the Sports Wagering Account (*e.g.*, active, dormant, closed, suspended, excluded, *etc.*).
- (4) The following information maintained as part of the electronic patron file shall be stored in encrypted form and protected in accordance with all provisions of 205 CMR regarding data privacy and security:
 - (a) The patron's social security number, taxpayer identification number, passport number, other government identification number(s), or portion(s) thereof;
 - (b) The patron's password(s), PIN(s), or other authentication credential(s); and
 - (c) The patron's debit instrument number(s), debit card number(s), bank account number(s) or other personal financial information.

248.04: Age and Identity Verification

- (1) No Sports Wagering Operator shall allow any individual who is either younger than 21 years old, or is a prohibited person, as defined in 205 CMR 238.33(1), to create a Sports Wagering Account. 205 CMR 248.04 shall not be construed to prevent a restricted patron, as defined in 205 CMR 238.32, from creating a Sports Wagering Account and depositing funds to such an account.

248.04 : continued

(2) The Sports Wagering Operator shall employ electronic verification at the time of account establishment with respect to each patron's name, date of birth and Social Security number, or the last four digits of the Social Security number, or other Federal Identification Number, by a Commission-approved national independent reference company or another independent technology approved by the Commission which meets or exceeds the reliability, security, accuracy, privacy and timeliness provided by individual reference service companies.

(3) The Sports Wagering Operator shall refuse to establish an account if it finds that any of the information supplied is untrue or incomplete.

(4) The Sports Wagering Operator shall at the time of account establishment, utilize identity authentication questions that require a patron to provide information known only to the patron through security questions, unless an alternate method of authentication is approved by the Commission.

(5) A Sports Wagering Operator must document and use commercially reasonable standards to confirm that an individual attempting to create a Sports Wagering Account is not a prohibited Person.

(6) Upon developing reasonable suspicion that the patron's identification has been compromised, a Sports Wagering Operator must re-verify the patron's identification immediately.

248.05 : Limitation to One Account per Patron

(1) No Sports Wagering Operator shall allow a patron to establish more than one username or more than one Sports Wagering Account with the Operator.

(2) The system of internal controls submitted by a Sports Wagering Operator in accordance with 205 CMR 238.00: *Uniform Standards of Accounting Procedures and Internal Controls for Sports Wagering* shall implement procedures to terminate all accounts of any patron that establishes or seeks to establish more than one account, whether directly or by use of another Person as proxy. Such procedures may allow a patron that establishes or seeks to establish more than one username or more than one account to retain one account provided that the Sports Wagering Operator investigates and makes a good-faith determination that the patron's conduct was not intended to obtain a competitive advantage.

248.06 : Terms and Conditions and Privacy Policies

(1) All terms and conditions and privacy policies for Sports Wagering Accounts shall be readily accessible to the patron before and after registration. Sports Wagering Operators shall inform patrons of any material changes or updates to said terms and conditions or privacy policies.

(2) All terms and conditions for Sports Wagering Accounts must address all aspects of the Sports Wagering operation including, but not limited to, all of the following:

- (a) A statement that only individuals over the age of 21 and located in the authorized geographic boundaries within the Commonwealth may participate in Sports Wagering;
- (b) Advice to the patron to keep their authentication credentials secure;
- (c) All processes for dealing with lost authentication credentials, forced password changes, password strength and other related items as required by the Commission;
- (d) Full explanation of all rules applicable to dormant Sports Wagering Accounts, including the conditions under which an account may be declared dormant and what actions will be undertaken on the account once this declaration is made;
- (e) Actions that will be taken on the patron's pending wagers placed prior to any exclusion or suspension, including the return of all wagers, or settling all wagers, as appropriate;
- (f) Information about timeframes and limits regarding deposits to, or withdrawals from, the Sports Wagering Account, including a clear and concise explanation of all fees, if applicable; and
- (g) Statements indicating that the Sports Wagering Operator has the right to:
 1. Refuse to establish a Sports Wagering Account for what it deems good and sufficient reason;

248.06: continued

2. Refuse deposits to, or withdrawals from, Sports Wagering Accounts for what it deems good and sufficient reason; and
 3. Unless there is a pending investigation or patron dispute, suspend or close any Sports Wagering Account at any time, provided such suspension or closure is in accordance with the terms and conditions between the Sports Wagering Operator and the patron, M.G.L. c. 23N, and 205 CMR.
- (3) All privacy policies for Sports Wagering Accounts must address all aspects of Confidential Information and Personally Identifiable Information protection, including, at a minimum any measures required by 205 CMR, M.G.L. c. 93H, M.G.L. c. 93I, 201 CMR 17.00: *Standards for the Protection of Personal Information of Residents of the Commonwealth*, and any other applicable law, regulation or order of a governmental body.
- (a) The Confidential Information and Personally Identifiable Information required to be collected;
 - (b) The purpose and legal basis for Confidential Information and Personally Identifiable Information collection and of every processing activity for which consent is being sought;
 - (c) The period in which the Confidential Information and Personally Identifiable Information is stored, or, if no period can be possibly set, the criteria used to set this. It is not sufficient for the Sports Wagering Operator to state that the Confidential Information and Personally Identifiable Information will be kept for as long as necessary for the legitimate purposes of the processing;
 - (d) The conditions under which the Confidential Information and Personally Identifiable Information may be disclosed;
 - (e) An affirmation that measures are in place to prevent the unauthorized or unnecessary disclosure of the Confidential Information and Personally Identifiable Information; and
 - (f) The identity and contact details on the Sports Wagering Operator who is seeking the consent, including any Sports Wagering Vendor(s) which may access and or use this Confidential Information and Personally Identifiable Information;
 - (g) That the patron has certain rights with respect to their Confidential Information and Personally Identifiable Information pursuant to 205 CMR, M.G.L. chs. 93H and 93I and 201 CMR 17.00: *Standards for the Protection of Personal Information of Residents of the Commonwealth*.
 - (h) The rights of a patron to file a complaint concerning the use or storage of the patron's Confidential Information and Personally Identifiable Information to the Commission, the Office of Consumer Affairs and Business Regulation, the Office of the Attorney General, or any other law enforcement entity regarding the use of the patron's Confidential Information and Personally Identifiable Information;
 - (i) For Confidential Information and Personally Identifiable Information collected directly from the patron, whether there is a legal or contractual obligation to provide the Confidential Information and Personally Identifiable Information and the consequences of not providing that information;
 - (j) Where applicable, information on the Sports Wagering Operator's use of automated decision-making, including profiling, and at least in those cases, without hindering compliance with other legal obligations:
 1. Sufficient insight into the logic of the automated decision-making;
 2. The significance and the envisaged consequences of such processing for the patron; and
 3. Safeguards in place around solely automated decision-making, including information for a patron on how to contest the decision and to require direct human review or intervention.

248.07: Account Access

- (1) Upon opening a Sports Wagering Account, the Sports Wagering Operator shall allow each patron to establish a password to be used in conjunction with a username, or an alternative secure authentication credential, for use by the patron to assure that only the patron has access to the Sports Wagering Account. The Operator may make more than one permitted method of authentication available for a patron to access their account.

248.07 : continued

- (2) If the system does not recognize the authentication credentials when entered, an explanatory message shall be displayed to the patron which prompts the patron to try again. The error message shall be the same regardless of which authentication credential is incorrect.
- (3) Patrons must be given the option to use a multi-factor authentication process when accessing their account. In addition, a multi-authentication process shall be employed for the retrieval or reset of a patron's forgotten or lost authentication credentials.
- (4) Current account balance information, including any restricted wagering credits and unrestricted funds, and transaction options shall be available to the patron once the patron has been authenticated. All restricted wagering credits and unrestricted funds that may expire shall be identified separately.
- (5) The Operator shall employ a mechanism allowing for an account to be locked in the event that suspicious authentication activity is detected including, but not limited to, three consecutive failed access attempts in a 30-minute period. A multi-factor authentication process shall be employed for the account to be unlocked.

248.08 : Sufficient Account Balance

Wagers and withdrawals will not be accepted which would cause the available balance of a Sports Wagering Account to fall below \$0. Any account not updated when a transaction is completed shall be inoperable until the transaction is posted and the account balance updated.

248.09 : Financial Transactions

Operators shall provide a patron written confirmation or denial of every financial transaction initiated using the patron's Sports Wagering Account, including:

- (a) The type of transaction (deposit/withdrawal);
- (b) The transaction value; and
- (c) For denied transactions, a descriptive message as to why the transaction did not complete as initiated.

248.10: Account Deposits

- (1) A Sports Wagering Account may be funded using approved methods which shall produce a sufficient audit trail for verification of the source of the wagers.
- (2) Approved methods for funding Sports Wagering Accounts include:
 - (a) Cash or cash equivalents;
 - (b) Foreign currency and coin converted to U.S. currency;
 - (c) Digital, crypto and virtual currencies converted to cash;
 - (d) Electronic funds transfers (EFTs), including online and mobile payment systems;
 - (e) Debit instruments, including debit cards and prepaid access instruments;
 - (f) Promotional Gaming Credits;
 - (g) Sports Wager Payouts;
 - (h) Adjustments made by the Sports Wagering Operator with documented notification to the patron; and
 - (i) Any other means approved by the Commission or its designee.
- (3) No deposits may be made by credit card, either directly or indirectly, including without limitation through an account funded by credit card, and no Wagering on credit is allowed.
- (4) The Sports Wagering Account shall be credited for any deposit in accordance with the system of internal controls submitted by a Sports Wagering Operator in accordance with 205 CMR 238.00.
- (5) The proceeds of a check may first need banker's clearance. Holding periods will be determined by the Sports Wagering Operator and communicated to the patron.

248.10 : continued

(6) For debit cards and EFTs, the patron may be liable for any charges imposed by the transmitting or receiving Sports Wagering Operator. Such charges may be deducted from the patron's Sports Wagering Account.

248.11 : Failed Electronic Funds Transfers (EFTs)

(1) The Sports Wagering Operator shall have security measures and controls to prevent EFT fraud where financial transactions are conducted through EFT. A failed EFT attempt is not considered fraudulent if the patron has successfully performed an EFT on a previous occasion and has no outstanding chargebacks. Otherwise, the Sports Wagering Operator shall:

- (a) Temporarily block the patron's Sports Wagering Account for investigation of fraud after five consecutive failed EFT attempts within a ten-minute period. If there is no evidence of fraud, the block may be vacated; and
- (b) Suspend the patron's Sports Wagering Account after five additional consecutive failed EFT attempts within any subsequent ten-minute period.

248.12 : Account Withdrawals

(1) The Sports Wagering Operator shall implement procedures that:

- (a) Prevent unauthorized withdrawals from Sports Wagering Accounts by the Sports Wagering Operator or others;
- (b) Establish a protocol by which patrons can withdraw funds maintained in their Sports Wagering Accounts, whether such accounts are open or closed, except as otherwise provided in 205 CMR, or any other applicable state, local or federal law.

(2) Pursuant to M.G.L. c. 23N, § 4(d)(2)(vi), a patron must be allowed to withdraw the funds maintained in his or her Sports Wagering Account, without further solicitation or promotion in the manner in which the funds were deposited.

(a) Upon a request from a patron to withdraw funds from their Sports Wagering Account, the Sports Wagering Operator shall immediately freeze the amount requested and ensure the funds cannot be used for any other purpose until the withdrawal is complete.

(3) A Sports Wagering Operator must employ a mechanism that can detect and prevent any withdrawal activity initiated by a patron that would result in a negative balance of the Sports Wagering Account.

(4) A Sports Wagering Operator shall not allow a Sports Wagering Account to be overdrawn unless caused by payment processing issues outside the control of the Sports Wagering Operator.

(5) Except as otherwise provided in 205 CMR 248.12(5)(a), requests for withdrawals must be honored by the later of five business days of the request or ten business days of submission of any tax reporting paperwork required by law.

(a) If the Sports Wagering Operator believes in good faith that the patron engaged in either fraudulent conduct or other conduct that violate or would put the Sports Wagering Operator in violation of 205 CMR, the Sports Wagering Operator may decline to honor the request for withdrawal for a reasonable investigatory period until its investigation is resolved if it provides notice of the nature of the investigation to the patron.

(b) For purposes of the timing requirements of 205 CMR 248.12(5), a request for withdrawal will be considered honored if it is processed by the Sports Wagering Operator but delayed by a payment processor, debit card issuer or by the custodian of a financial account.

(6) The Sports Wagering Operator shall not be liable for any unauthorized withdrawal of funds from a Sports Wagering Account where such unauthorized withdrawal is not caused by the negligence or misconduct of the Sports Wagering Operator. It is the patron's responsibility to protect deposits in the account by keeping their authentication credentials strictly confidential.

248.13 : Account Adjustments

The Sports Wagering Operator shall perform periodic reviews of all adjustments to Sports Wagering Accounts for amounts of five hundred dollars or less by supervisory personnel. All adjustments of more than five hundred dollars must be authorized by supervisory personnel

248.13: continued

before being entered.

248.14 : Account Credits

When a Sports Wagering Account is entitled to a payout or refund, said monies will be credited to the respective account, thus increasing the credit balance. It is the responsibility of the patron to verify their balance and notify the Sports Wagering Operator of any discrepancy or dispute within the time frame specified in the terms and conditions. Unresolved disputes may be forwarded to the Commission by the Sports Wagering Operator or the patron. The Commission will consider no such claim unless submitted in writing and accompanied by supporting evidence.

248.15 : Account Records and Statements

The Sports Wagering Operator must maintain complete records of every deposit, withdrawal, wager, and payout for each Sports Wagering Account. In accordance with M.G.L. c. 23N, § 4(d)(2)(iv), upon request of the patron, the Sports Wagering Operator shall offer patrons access to a statement detailing their account history and account details for the past year.

248.16 : Responsible Gaming Limits

(1) In accordance with M.G.L. c. 23N, § 13(e)(3), a Category 3 Sports Wagering Operator shall allow the patron to set self-imposed limitations on sports wagering at any time, including when the patron signs up for a Sports Wagering Account. Such limitations must include the following and must be clearly and conspicuously displayed prior to allowing registration of a new account, the first time a patron makes a deposit into an account, and the first time the patron places a wager from an account:

- (a) The Operator must offer daily, weekly and monthly deposit limits, which shall specify the maximum amount of money a patron may deposit into their Sports Wagering Account during a particular period of time.
- (b) The Operator must offer daily, weekly and monthly wager limits, which shall specify the maximum amount of patron funds that may be put at risk during a particular period of time.

(2) A change to make these limits more restrictive shall be effective immediately. A change to make these limits less restrictive shall become effective the next business day after the time period of the previous limit has expired, and the patron reaffirms the requested increase.

248.17 : Account Suspension and Restoration

- (1) A Sports Wagering Account shall be suspended under the following conditions:
 - (a) When requested by the patron for a specified period of time, which must not be less than 72 hours;
 - (b) When required by the Commission;
 - (c) When a Sports Wagering Operator determines that the patron is a prohibited Person; or
 - (d) When a Sports Wagering Operator has evidence that indicates any of the following:
 - 1. That the account has been used for illegal activity;
 - 2. That the account has a negative balance; or
 - 3. That the patron has violated the account's terms and conditions.

(2) When a Sports Wagering Account is suspended, the Sports Wagering Operator must do all of the following:

- (a) Prevent the patron from placing Sports Wagers;
- (b) Prevent the patron from depositing funds unless the account is suspended due to having a negative Sports Wagering Account balance, but only to the extent the account balance is brought back to zero dollars;
- (c) Prevent the patron from withdrawing funds from a Sports Wagering Account, unless the Sports Wagering Operator determines that the funds have cleared, and that the reason(s) for suspension would not prohibit a withdrawal;
- (d) Prevent the patron from making changes to his or her Sports Wagering Account;
- (e) Prevent the patron from permanently closing their Sports Wagering Account; and

248.18 : Account Credits

When a Sports Wagering Account is entitled to a payout or refund, said monies will be credited to the respective account, thus increasing the credit balance. It is the responsibility of the patron to verify their balance and notify the Sports Wagering Operator of any discrepancy or dispute within the time frame specified in the terms and conditions. Unresolved disputes may be forwarded to the Commission by the Sports Wagering Operator or the patron. The Commission will consider no such claim unless submitted in writing and accompanied by supporting evidence.

248.19 : Account Records and Statements

The Sports Wagering Operator must maintain complete records of every deposit, withdrawal, wager, and payout for each Sports Wagering Account. In accordance with M.G.L. c. 23N, § 4(d)(2)(iv), upon request of the patron, the Sports Wagering Operator shall offer patrons access to a statement detailing their account history and account details for the past year.

248.20 : Responsible Gaming Limits

(1) In accordance with M.G.L. c. 23N, § 13(e)(3), a Category 3 Sports Wagering Operator shall allow the patron to set self-imposed limitations on sports wagering at any time, including when the patron signs up for a Sports Wagering Account. Such limitations must include the following and must be clearly and conspicuously displayed prior to allowing registration of a new account, the first time a patron makes a deposit into an account, and the first time the patron places a wager from an account:

- (a) The Operator must offer daily, weekly and monthly deposit limits, which shall specify the maximum amount of money a patron may deposit into their Sports Wagering Account during a particular period of time.
- (b) The Operator must offer daily, weekly and monthly wager limits, which shall specify the maximum amount of patron funds that may be put at risk during a particular period of time.

(2) A change to make these limits more restrictive shall be effective immediately. A change to make these limits less restrictive shall become effective the next business day after the time period of the previous limit has expired, and the patron reaffirms the requested increase.

248.21 : Account Suspension and Restoration

(1) A Sports Wagering Account shall be suspended under the following conditions:

- (a) When requested by the patron for a specified period of time, which must not be less than 72 hours;
- (b) When required by the Commission;
- (c) When a Sports Wagering Operator determines that the patron is a prohibited Person; or
- (d) When a Sports Wagering Operator has evidence that indicates any of the following:
 - 1. That the account has been used for illegal activity;
 - 2. That the account has a negative balance; or
 - 3. That the patron has violated the account's terms and conditions.

(2) When a Sports Wagering Account is suspended, the Sports Wagering Operator must do all of the following:

- (a) Prevent the patron from placing Sports Wagers;
- (b) Prevent the patron from depositing funds unless the account is suspended due to having a negative Sports Wagering Account balance, but only to the extent the account balance is brought back to zero dollars;
- (c) Prevent the patron from withdrawing funds from a Sports Wagering Account, unless the Sports Wagering Operator determines that the funds have cleared, and that the reason(s) for suspension would not prohibit a withdrawal;
- (d) Prevent the patron from making changes to his or her Sports Wagering Account;
- (e) Prevent the patron from permanently closing their Sports Wagering Account; and

248.17 : continued

(f) Prominently display to the patron that the Sports Wagering Account is suspended, the restrictions placed on the Sports Wagering Account, any further course of action needed to lift the suspension, a notification of the Patron's rights under the Operator's House Rules and Internal Controls to submit a complaint, and directions on how to file such a complaint.

(3) A suspension may be lifted for any of the following reasons:

- (a) Upon expiration of the time period established by the patron;
- (b) If authorized by the Commission;
- (c) When the patron is no longer a prohibited Person; or
- (d) When the Sports Wagering Operator has investigated the evidence of illegal activity, a negative account balance, or a violation of the account's terms and conditions, and determined that the suspension should be lifted.

(4) Each Sports Wagering Operator shall, on a monthly basis, provide the Commission with a list of suspended accounts, including the reasons why the account is in suspended mode, and an explanation of the lifting of any suspension under 205 CMR 248.17(3)(d).

248.18 : Account Closure

The Sports Wagering Operator shall permit a patron to permanently close a Sports Wagering Account registered to the patron on any or all platforms owned or operated by the Sports Wagering Operator at any time and for any reason unless the account is in suspended mode pursuant to 205 CMR 248.17. The Sports Wagering Operator may also close a Sports Wagering Account when the patron makes repeated attempts to operate with an insufficient balance. Upon closing an account, the Sports Wagering Operator shall refund the remaining balance to the patron within five business days, provided that the Sports Wagering Operator acknowledges that the funds have cleared.

248.19 : Abandoned Funds and Dormant Accounts

(1) Subject to the provisions of M.G.L. c. 200A, §§ 7 and 8A, and 960 CMR 4.00: *Procedures for the Administration of Abandoned Property*, the Sports Wagering Operator shall presume that the funds in any account without any activity for a period of three years after the balance in that account became payable or deliverable to the patron to have been abandoned. For purposes of this 205 CMR 248.19(1), the term "activity" means Sports Wagers, customer-generated deposits, or customer-generated withdrawals.

(2) The Sports Wagering Operator shall report and deliver all Sports Wagering Accounts presumed abandoned to the Treasurer of the Commonwealth as provided for by M.G.L. c. 200A, §§ 7 and 8A, and 960 CMR 4.03: *Reporting Abandoned Property*.

(3) Subject to M.G.L. c. 200A, 7A and 960 CMR 4.03: *Reporting Abandoned Property*, at least 60 days prior to reporting any Sports Wagering Accounts to the Treasurer, the Sports Wagering Operator shall provide notice to the patron's last known address and conduct reasonable due diligence to locate the patron. During this time period the account shall be deemed dormant. In addition, the Operator shall:

- (a) Allow access to a dormant account only after performing additional identity verifications; and
- (b) Protect dormant accounts that contain funds from unauthorized access, changes or removal.

REGULATORY AUTHORITY

205 CMR 248.00: M.G.L. 23N, §§ 4, 11 and 13; M.G.L. c. 200A, §§ 7 and 8A.



SMALL BUSINESS IMPACT STATEMENT

The Massachusetts Gaming Commission (“Commission”) hereby files this Small Business Impact Statement in accordance with G.L. c. 30A, §2, relative to the proposed adoption of **205 CMR 248.12, Sports Wagering Account Management**.

This regulation is being promulgated as part of the process of updating regulations governing adjudicatory hearings before the Massachusetts Gaming Commission. It sets forth the requirements for adjudicatory proceedings for new qualifiers.

The proposed 205 CMR 248.12 applies to entities licensed by the Commission under G.L. c. 23N. Accordingly, this regulation is unlikely to have an impact on small businesses. Under G.L. c.30A, §2, the Commission offers the following responses to the statutory questions:

1. Estimate of the number of small businesses subject to the proposed regulation:

Small businesses are unlikely to be subject to this regulation.

2. State the projected reporting, recordkeeping, and other administrative costs required for compliance with the proposed regulation:

There are no projected reporting, recordkeeping, or other administrative costs required for small businesses to comply with this regulation.

3. State the appropriateness of performance standards versus design standards:

The standards set forth are design standards.

4. Identify regulations of the promulgating agency, or of another agency or department of the Commonwealth, which may duplicate or conflict with the proposed regulation:

There are no conflicting regulations in 205 CMR, and the Commission is unaware of any conflicting or duplicating regulations of any other agency or department of the Commonwealth.

5. State whether the proposed regulation is likely to deter or encourage the formation of new businesses in the Commonwealth:

This amendment is unlikely to have any impact on the formation of new businesses in the Commonwealth.



Massachusetts Gaming Commission

Massachusetts Gaming Commission
By:

/s/ Autumn Birarelli
Autumn Birarelli, Staff Attorney

Dated: July 24, 2025



Massachusetts Gaming Commission

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TO: Chair Jordan Maynard and Commissioners Eileen O'Brien, Bradford Hill, Nakisha Skinner and Paul Brodeur

FROM: Joseph Delaney, Chief of Community Affairs, Mary Thurlow, Senior Program Manager

CC: Dean Serpa, Executive Director, Justin Stenbeck, Interim General Counsel

DATE: July 24, 2025

RE: Community Mitigation Fund Attorney General Gant FY 2026

This request is for an amendment to increase the total grant amount due to the administrative costs set by the Comptroller's office. This will increase the grant from \$259,800 to \$280,400. Because this request is increasing the overall grant amount, the Review Team thought it was prudent to have the Commission vote on this matter.

Background

On April 28, 2025 Nathan Gardner of the Attorney General's office contacted the Community Affairs staff with a question regarding the indirect billing rates. The AGO's office is charged at the indirect billing rate of 25%. Our CFO Derek Lennon explains that: "Indirect costs for agencies that receive direct federal funding (which the AGO does) are negotiated on behalf of the agency by the state comptroller's office and tend to be higher than the default 10% rate that ANF authorizes OSC to charge to agencies that do not receive direct federal funding (MGC). Indirect is assessed against object classes AA, CC, HH, JJ, and UU."

The Attorney General's office requested an increase in their FY 2026 grant amount as the indirect rate will be charged against salary and fringe at 25% throughout the life of the ISA. This results in an increase in indirect costs of \$20,542. The request for the increase in funding was inadvertently left out of the Review Team's evaluation of the project.

Recommendation

For the Attorney General's office to receive the full benefit of their grant the CMF team recommends that the AGO be granted an increase in the total grant amount to \$280,400 so they can receive the full benefit of the grant.

The following is a breakdown of the grant costs showing the addition of the indirect costs.



Massachusetts Gaming Commission

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Description		Budget
Assistant Attorney General Salary	Direct Cost	\$61,630.62
Victim Witness Advocate Salary	Direct Cost	45,000.00
Assistant Attorney General Fringe -	Direct Cost	\$27,794.76
Victim Witness Advocate Fringe	Direct Cost	\$20,277.00
Meals- DV/SA/HT Training/Conference	Direct Cost	\$3,750.00
Ground Transportation - DV/SA/HT Training/Conference	Direct Cost	\$500.00
Subcontract – Massachusetts State Police Overtime	Direct Cost	\$50,268.00
Administrative Costs -	Indirect Cost	\$18,103.62
Translation	Direct Cost	\$20,000.00
Registration Fee - DV/SA/HT Training/Conference	Direct Cost	\$4,000.00
Airfare - DV/SA/HT Training/Conference	Direct Cost	\$4,500.00
Lodging - DV/SA/HT Training/Conference	Direct Cost	\$4,000.00
Federal Grant Administrative cost of 25%	Indirect Cost	\$20,542.00



Massachusetts Gaming Commission

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TO: Chair Jordan Maynard and Commissioners Eileen O'Brien, Bradford Hill, Nakisha Skinner and Paul Brodeur

FROM: Joseph Delaney, Chief of Community Affairs, Mary Thurlow, Senior Program Manager

CC: Dean Serpa, Executive Director, Justin Stenbeck, Interim General Counsel

DATE: July 24, 2025

RE: Re-allocation – Saugus 2022 Rail Trail Lighting Grant

Background: Saugus was awarded \$187,000 in the 2022 round of Community Mitigation Fund Grants to purchase and install 43 standalone solar lights to improve public safety along the Northern Strand Community Trail which runs through Saugus.

The project was initially delayed when Saugus ran into a long lead time to acquire the light fixtures. The project was additionally delayed when the project manager left Saugus. Further work on the design and implementation by the new Project Manager showed that the solar lights would have to be placed at such heights that it would disrupt the local environment and would be a nuisance to the residents.

Re-allocation Request

Keeping within the public safety domain, Saugus is proposing changes to crosswalk beacons along the Northern Strand. Four beacons would be retrofitted with sensors that signal the crosswalk beacons that pedestrians or cyclists are approaching, giving motorists time to decrease their speed and stop. Additionally, Saugus would like to add two more crosswalk beacons to Eustis Street and School Street. The total cost of these upgrades is estimated to be \$107,400.

Recommendation:

The Review Team views this re-allocation request as reasonable. Saugus anticipates getting this project completed prior to the expiration date of the Grant which is 6/30/2026. Although the estimated cost is less than the original grant, staff recommends that the Commission approve of the total amount of \$187,000 to cover any unanticipated expenses. Any remaining balance after receipt of all invoices for this project would go back into the Community Mitigation Fund.



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TO: Chair Jordan Maynard and Commissioners Eileen O'Brien, Bradford Hill, Nakisha Skinner and Paul Brodeur

FROM: Joseph Delaney, Chief of Community Affairs, Mary Thurlow, Senior Program Manager

CC: Dean Serpa, Executive Director, Justin Stenbeck, Interim General Counsel

DATE: July 24, 2025

RE: Re-allocation - Springfield 2020 Specific Impact City Stage Capital Improvements and System Upgrades for \$300,000

Background: In 2020, the City of Springfield received a grant in the amount of \$300,000 for capital improvements to the City Stage property to allow for its use by the Springfield Public Access television station FOCUS Springfield. The City Stage property is owned by the Springfield Parking Authority and is part of the Columbus Center parking garage complex. After significant efforts and coordination among the City, FOCUS Springfield, and the Springfield Parking Authority, it was determined that the estimated \$1.2M–\$1.5M buildout was financially unfeasible.

In the meantime, a new opportunity has emerged at the site that provides significant mitigation value: Hope for Youth and Families has invested more than \$12 million to transform City Stage into a state-of-the-art Youth and Arts Center. This development stands to bring substantial regional arts, youth programming, and community-based events to Springfield, increasing transient traffic and local economic activity. However, the supporting Columbus Center Garage facility, which serves as the essential infrastructure for this resurgence, remains in critical need of capital improvements due to water infiltration, lighting deficiencies, and structural wear that compromise both safety and usability.

Request: The Springfield Parking Authority has requested a change in use for the \$300,000 awarded in 2020. The Springfield Parking Authority is proposing capital improvements to the Columbus Center parking garage to support the redevelopment of the City Stage property. These improvements include

- **Waterproofing and Leak Repair:** Addressing persistent leaks that affect the interior of the theater space and undermine both public safety and long-term viability.
- **Lighting Upgrades:** Enhancing lighting on garage decks and common areas to improve public safety, visibility, and general usability.



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- **Surface Deck Repair and Resurfacing:** Repairing deteriorating surfaces to ensure ADA compliance, reduce liability risk, and maintain functionality.

The overall project cost is estimated to be over \$2.5 million. The Springfield Parking Authority will be responsible for the costs in excess of the CMF grant.

Recommendation: The original grant was to be used for capital improvements to the Springfield Parking Authority owned City Stage property and this proposed reuse of the funds will also go towards capital improvements. The re-activation of the City Stage space, which has been empty since the end of 2018, will provide a significant boost to the downtown area and will help the Springfield Parking Authority recoup some of the revenues lost to the free MGM garage. This will also attract regional event traffic to the area and support economic development.

While the project scope has changed, the Review Team agrees that these improvements will help ensure the success of this new venture and help mitigate some of the negative impacts on the Springfield Parking Authority. Therefore, the Review Team recommends the re-purposing of these funds.