



TO: Chairman Crosby, Commissioners Cameron, Macdonald, Stebbins, Zuniga

FROM: Mark Vander Linden, Director of Research and Responsible Gaming,
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DATE: December 7, 2017

RE: Play management recommendation

Background

A key educational objective of the Massachusetts Gaming Commission (Commission) Responsible Gaming Framework is to “provide accurate and balanced information to enable informed choices to be made about gaming activities”. To support this objective, Strategy 2 of the framework identifies measures to support players’ efforts to responsibly manage their gambling by including the development and implementation of play management tools. Such tools are incorporated into electronic gaming machines to enable players to more easily track their play, manage their gambling decisions, and obtain real time individualized play feedback.

In December, 2014 the Commission voted to adopt a play management system (PlayMyWay) in cooperation with Plainridge Park Casino (PPC). However, because the existing body of research supporting the effectiveness of these tools is limited and inconclusive, the Commission specified that implementation would be on a test basis and that determination of whether this program is continued and extended to Category 1 casinos would be informed, in part, by the findings of an evaluation. To advise on the development and evaluate the program the Commission contracted with the Cambridge Health Alliance, Division on Addiction (CHA).

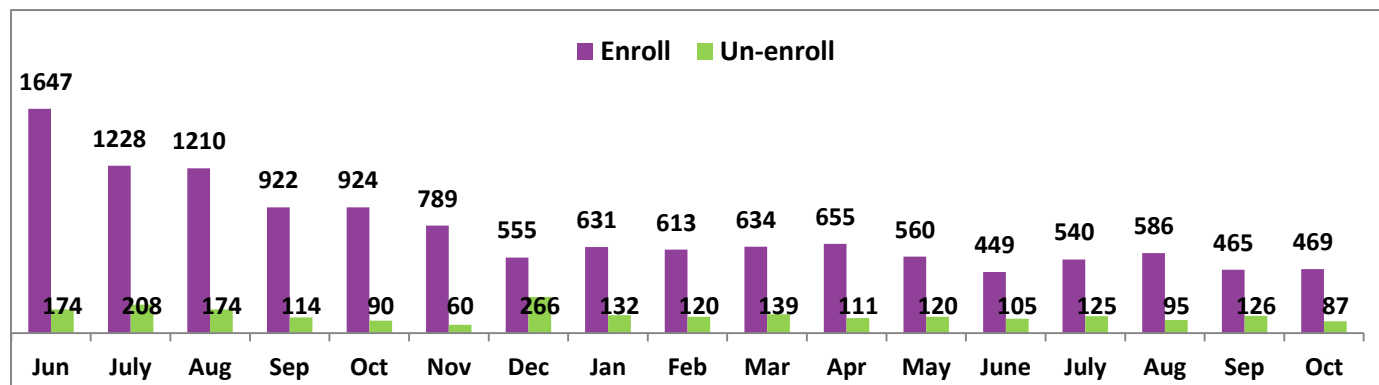
Following 18 months of development, on June 9, 2016, PlayMyWay (PMW) was launched at PPC as a benefit to their Marquee Reward® (player card) members. Patrons have the opportunity to enroll in the program at any slot machine, GameSense Kiosk or at the GameSense Info Center located inside the casino. PMW prompts cardholders to voluntarily set a daily, weekly, and/or monthly budget to track their spending at PPC. Once enrolled, patrons receive automatic notifications as they approach 50% and 75% of their spent budget. Players also receive a notification when they reach 100% of their budget, and if they continue to play, they will receive notifications at 25% intervals. This program is strictly voluntary and a player can un-enroll or adjust the budget(s) at any time. A player also can choose to stop at any point or keep playing.



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Player enrollment

Through October 31, 2017, 15,123 persons have enrolled in the program. The un-enrollment rate is 17% leaving 12,877 currently enrolled. This represents almost 9.7% of Marquee Rewards® cardholders who gambled at Plainridge Park Casino during the study period.



Evaluation and Research

On November 21, 2017 CHA presented to the MGC the *Preliminary Study of Patrons' Use of the PlayMyWay Play Management System at Plainridge Park Casino: June 8, 2016 – January 31, 2017*. The preliminary study includes a de-identified, basic epidemiology of Marquee Rewards Card gambling records that provides sample characteristics, game characteristics, cash activity and gambling activity information. The PMW records provided CHA with information about players' budgets and notification activity. Key findings include:

- PMW users had significantly more cash activity than non-users on slot machines and electronic table games. For example, during the entire study period, PMW users inserted significantly more cash into slot machines than non-users (difference of means = \$620.50, $p < 0.01$). They also withdrew more funds than non-users (difference of means = \$692.31, $p < 0.01$).
- With respect to gambling activity, PMW users tended to wager less money as well as lose less money per day compared to non-users. Whereas the median PMW-user wagered \$347.80 and lost \$47.50 per day, their non-user counterparts wagered \$485.30 and lost \$62.90.
- Overall, slightly less than two-thirds of all PMW users (63.0%) never exceeded their budgets; just over one-third of all users (37.0%) exceeded their budgets at least once during the study period.
- The vast majority of PMW users were from Massachusetts (78.4%) and other New England states. The PMW users had an average age of 54 and were significantly younger than the non-users. PMW and non-users visited PPC an average of 6.5 and 6.8 times, respectively, during the study period.

As stated earlier, at the time the Commission adopted play management tools on a test basis the existing evidence of their effectiveness was inconclusive. Since that time, there have been a hand full of new studies that add to the body of research to support the topic. A few promising studies include the following.



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- Wood, Richard and Wohl, Michael “Assessing the effectiveness of a responsible gambling behavioral feedback tool for reducing the gambling expenditure of at risk players”. *International Gambling Studies, Vol. 15 No.2. 2015. 1-16.*

This research examines the utility of a play management tool which was implemented online in Sweden. Findings suggest that the use of this type of tool which informs internet gamblers that their behavior is becoming risky is associated with a reduction in future player spending. Thus, informing at-risk players who have opted to receive feedback about their gambling appears to have a positive impact on subsequent expenditures.

- Wohl, Michael and Davis, Christopher and Hollingshead, Samantha “How Much Have You Won or Lost? Personalized Behavioral Feedback about Gambling Expenditures Regulates Play”. *Computers in Human Behavior Vol. 70 May 2017. 437-445.*

This study supports the theory that providing players with feedback on their behavior can help moderate their expenditures. Through this work, researchers found that players’ perception of their expenditures and overall recall of gambling behavior-particularly at EGMs-is typically inaccurate.

Options to advance PlayMyWay

As the Commission considers next steps to advance play management, I’d like to outline four options with a list of advantages and disadvantages. This is a non-inclusive list as there are likely additional options and considerations.

- 1) Advance play management tools by promulgating a play management regulation and/or rules.

Advantage

- Assures consistent implementation and reporting across all MGC licensees.
- Responsibility of play management software development is placed on to the subject matter experts (System & Slot Machine manufacturers). Advances a key strategy of the MGC Responsible Gaming Framework.
- Assures the same rigorous testing through GLI and/or BMM and MGC testing lab as all other electronic gaming devices in Massachusetts.
- Minimizes the time and effort needed for on-floor testing in advance of deployment.
- Consistent player experience across operators.



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Disadvantage

- Evaluation of PlayMyWay is ongoing. An additional study is anticipated in June, 2018. This report may provide findings the MGC should consider prior to the promulgation of regulation.
- Additional cost for vendor to release a product in Massachusetts.

2) Advance play management cooperatively with licensees through a non-regulatory path.

Advantage

- Allows for appropriate planning and development of play management in advance of further evaluation.
- Allows the MGC to withdraw support of PlayMyWay if further evaluation findings are unfavorable.
- Allows for potentially quicker changes to the system without updating regulation and test lab certification.
- Different versions would allow for comparison of products.

Disadvantage

- Provides the MGC less control over specific elements of the program.
- It's unclear who would bear the cost of development and implementation. Regardless, there is an additional cost to release a product in Massachusetts.
- Risk complicating the evaluation by potentially inconsistent requirements, testing and interpretation of system requirements.
- Less ability to control version changes consistently among licensees resulting in a potentially inconsistent player experience.

3) Maintain support of PlayMyWay at PPC but delay decision about advancing play management tools to Category 1 casinos.

Advantage

- Allows for further evaluation to guide the development of a play management system – both player experience and system reporting.
- Allows further refinement system requirements before rolling out to category 1 casinos.
- Allows the MGC to withdraw support of PlayMyWay if further evaluation finds harm or ineffectiveness.

Disadvantage

- Slows the development and deployment of PlayMyWay to Category 1 casinos.
- Different expectation between Category 1 and Category 2 casinos.



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- Circumvents the MGC electronic gaming device certification process.
 - Increases maintenance and development geared toward supporting PlayMyWay updates.
- 4) Abandon support of PlayMyWay at PPC and further discussions about implementation of a play management tool at Category 1 casinos.

Advantage

- Advancements in play management systems may continue as an extension of operators responsible gaming plans regardless of MGC involvement.

Disadvantage

- There is a significant chance that development of PlayMyWay and play management tools, generally, will slow, stall or be abandoned.
- Significant investment (financial and workforce) to advance play management tools would be lost.

Recommendation

There are several factors that should be weighed as the Commission considers advancing a play management tool.

- Enrollment into the program far exceeds expectations and appears to be greater than any jurisdiction that has done this previously. Consistent levels of unenrollment suggest program stability. From a programming perspective, these levels can be viewed as moderate.
- Preliminary evaluation findings appear very promising. We continue to work with our evaluation team at CHA to answer critical questions about reach and impact on specific types of gamblers.
- There has been a steady flow of new research on play management and similar types of tools. Findings from these studies generally conclude that they are effective at helping recreational and at-risk players manage the amount they spent on gaming. However, play management tools are still not considered a best practice and additional research in the area is needed.
- PMW hasn't created any major disruption to the gaming floor. Like any new technology, there have been a few challenges during implementation but they have been minimal.
- Anecdotally, feedback from patrons has been positive. They believe the tool is useful and appreciate the availability of this resource.

Based on the information outlined in this memo, I recommend the Commission create draft regulations that would require licensees to develop play management tools for their patrons. The regulation should remain flexible to respond to findings from on-going evaluation. Additionally, I recommend the Commission work closely with Category 1 licensees to develop a realistic timeline and plan for implementation.



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