Madison Brame

From: Josh Ercole <josh@pacouncil.com>
Sent: Wednesday, October 30, 2024 11:23 AM
To: GB, PGCB Regulations
Subject: [External] Subject: Regulation # 125-250

Dear Mr. Wood,

We are writing to express our concern regarding the proposed changes to Pennsylvania's Self-Exclusion Program (SEP) under Regulation # 125-250, in which land-based casino Self-Exclusion terms of one (1) year and five (5) years will move to automatic removals at the completion of each term, rather than remaining an active process.

In 2018, when the VGT (Section 1119.5) and Interactive Gaming (Section 815.6) regulations were initially being developed, CCGP expressed concern about the proposed automatic removals for 1 and 5 year Self-Exclusion terms. This aligns with the standards outlined by the National Council on Problem Gambling (NCPG) in the Internet Responsible Gambling Standards, where active removal is recommended in order to best protect players.

While self-exclusion is an incredibly valuable resource for individuals experiencing gambling related issues, it is our opinion that offering automatic removals for those who select one-year or five-year terms could lead to potential problems for individuals in various stages of recovery. By requiring individuals to request removal after their term has completed, individuals are given the opportunity to remain on the program by taking no action. Should they decide they no longer wish to remain on the program, they can proceed with the removal process, but the decision is ultimately theirs. By following this process, individuals will be kept in a safe place until they wish to no longer remain in that position. Automatic removal would take that decision away from them.

Among our main concerns regarding automatic removal:

- **Increased Risk of Relapse:** Individuals who have chosen self-exclusion are often battling a serious gambling disorder. Removing them from the list without their request increases the risk of relapse, especially during moments of weakness.
- **Protection of Vulnerable Individuals:** Self-Exclusion is a resource for those who are vulnerable to negative consequences of gambling disorder. Changes that make it easier to return to gambling put these individuals in a potentially dangerous position.
- **Potential for Negative Consequences:** Relapse can have a devastating impact on individuals, including financial issues, relationship problems, legal conflicts and even suicidal ideation. This policy change increases the potential for such outcomes.

- **Upholding Safer Gambling Practices:** The gambling industry has a responsibility to operate in a socially responsible manner. This includes implementing effective measures to prevent and mitigate the harms of gambling disorder. Changing the Casino SEP from how it currently exists would be a step in the opposite direction.
- **Preservation of Public Safety:** Problem gambling can have severe negative impacts on individuals, families, and communities. By maintaining a strong self-exclusion program, we can help to protect public safety and well-being and reduce social costs of problem gambling.

Recently, Lifetime Self-Exclusion terms were amended to allow individuals who have been enrolled in a SEP for a minimum of ten (10) years the opportunity to request removal. This process requires that an assessment be completed by an authorized treatment provider. This thorough approach is in place to determine whether a gambling disorder may be diagnosed and the goal is to ultimately protect the individual. This process is drastically different from the proposed automatic removals for those enrolled in shorter term programs, where no assessment of potential problems will be conducted.

As you may also be aware, there are many individuals who, over the years, have requested removal from existing Self-Exclusion Programs, only to quickly find that the problem is not under control, and they quickly re-enroll in the program – our concern is that if automatic removals are enacted, these problems will increase.

We urge the Pennsylvania Gaming Control Board to reconsider this proposal, and instead, focus on unifying the programs by changing the interactive gaming, fantasy contests and Video Gaming Terminals (VGT) SEP's to match the current Casino SEP, where all individuals remain on the self-exclusion list **until they actively request removal**.

We would like to thank you for your consideration of these points, and invite you to contact us directly with any questions that you may have.

Sincerely,

Josh Ercole

Executive Director

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