



November 25, 2024

Robert Wood
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Via Email and FedEx Next Day Delivery

RE: PGCB Proposed Regulation #125-250 (Casino Self-Exclusion; Interactive Gaming Self-Excluded Persons; and Self-Exclusion)

Dear Mr. Wood:

We, the undersigned Pennsylvania casinos, respectfully submit these comments to the Pennsylvania Gaming Control Board's ("Board") proposed regulations on casino self-exclusion.

I. The Board should modify Section 503a.2(b) of the proposed regulations to strengthen the Board's self-exclusion framework

The Board's proposed rulemaking would modify Section 503a.2 of the Board's regulations, which establishes the process for individuals to request to be self-excluded from gaming activity at licensed facilities. Section 503a.2(b) currently provides that an individual's request for casino self-exclusion include certain identifying information, including the individual's name and any aliases or nicknames. We urge the Board to modify this provision to specify that the name included on the request match the individual's non-expired government-issued identification ("ID"), without modification for aliases, nicknames, or middle initials unless they appear on the ID provided. Our proposed modification of Section 503a.2(b) follows:

(b) A request for casino self-exclusion must include the following identifying information:

- (1) Name, **exactly as it appears on the individual's non-expired government-issued identification, without modification to include aliases, nicknames, or middle initials unless they appear on the identification provided**~~including any aliases or nicknames.~~
- (2) Date of birth.
- (3) Address of current residence.
- (4) Telephone number.
- (5) Social Security number, or the last 4 digits of the individual's Social Security Number, when voluntarily provided in accordance with section 7 of the Privacy Act of 1974 (5 U.S.C.A. § 552a).
- (6) Physical description of the person, including height, gender, hair color, eye color and any other physical characteristic that may assist in the identification of the person.

58 Pa. Code § 503a.2(b).

II. The Board should modify Section 503a.3 to reflect that its official casino self-exclusion list will display each individual's name as it appears on a non-expired government-issued ID

We also urge the Board to modify Section 503a.3 of its regulations to reflect that the casino self-exclusion list maintained by the Board will display each individual's name as it appears on their non-expired government-issued ID. To standardize information on the self-exclusion list and aid casinos in the process of identifying self-excluded individuals, we propose the following modifications to Section 503a.3(a) and (b):

(a) The Board will maintain the official casino self-exclusion list and will make all necessary additions or deletions of individuals removed from the list under § 503a.5 (relating to removal from casino self-exclusion list) within 5 business days of the verification of the information received under § 503a.2 (relating to request for casino self-exclusion)~~and~~. **The casino self-exclusion list shall display each individual's name exactly as it appears on their non-expired government-issued identification. The Board shall make the casino self-exclusion list available to slot machine licensees electronically by means of the Board's self-exclusion system.**

(b) The information made available to slot machine licensees by means of the Board's self-exclusion system will include the following information concerning a person who has been added to the casino self-exclusion list:

- (1) Name, ~~including any aliases or nicknames.~~ **listed exactly as it appears on the person's non-expired government-issued identification without modification, including any aliases or nicknames only if they appear on the provided identification.**
- (2) Date of birth.

- (3) Address of current residence.
- (4) Telephone number.
- (5) Social Security number, or the last 4 digits of the individual's Social Security Number, when voluntarily provided in accordance with section 7 of the Privacy Act of 1974 (5 U.S.C.A. § 552a).
- (6) Physical description of the person, including height, gender, hair color, eye color and other physical characteristic, that may assist in the identification of the person.
- (7) A copy of the photograph taken by the Board or submitted electronically under § 503a.2(h) and (i).

58 Pa. Code § 503a.3(a) and (b).

III. The proposed modifications to self-exclusion procedures will help eliminate pathways for self-excluded individuals to access gaming privileges

Our proposed modifications to Sections 503a.2(b) and 503a.3(a) and (b) will help strengthen the Board's self-exclusion framework and will aid casinos in their efforts to promptly detect and address self-excluded individuals.¹ Casinos utilize various technology and software to promptly identify and detect self-excluded individuals. Casinos rely on the Board's self-exclusion list to identify individuals that have requested to be self-excluded. One method casinos rely on to identify self-excluded individuals is through self-exclusion flags in their player loyalty program. A casino's automated process for adding self-exclusion flags to player loyalty accounts can be ineffective if the Board's self-exclusion application programming interface ("API") reports the individual's name differently than how it appears on an individual's government-issued ID.

Requiring the request for casino self-exclusion and the Board's official casino self-exclusion list to include the individual's name in the same format as it appears on an individual's government-issued ID helps to avoid inconsistencies that may arise from alternative name formats, nicknames and aliases. Establishing this standard practice would help ensure consistency across various processes and would improve the efficiency of casino's identification processes and self-exclusion procedures. Having a standardized, verifiable name on the request (and casino self-exclusion list) would allow the Board and casino operators the ability to quickly and easily verify an individual's identity and reduce and/or eliminate delays in identifying self-excluded individuals. With the Board and casinos using the same verification method (name on a government-issued ID), the process of identifying self-excluded individuals will become more streamlined and efficient, reducing the time and resources needed to manually verify information. In addition, it helps establish a clear, accountable record of self-exclusion requests.

Our proposed regulatory revisions will go a long way to help casinos: (1) comply with their Compulsive and Problem Gambling Plans; and (2) successfully rely on procedures to prevent

¹ To further strengthen the Board's exclusion framework, we recommend that the Board modify the following regulations to ensure that lists maintained by the Board display each individual's name as it appears on their non-expired government-issued ID: (1) Sections 511a.2(b), (c)(1) on the Board's exclusion list; (2) Sections 609a.9(a), (b)(1) on the voluntary credit suspension list; and (3) Sections 815a.3, 815a.4(a), (b)(1) on the interactive gaming self-exclusion list.

excluded individuals from participating in gambling activities. Casinos use various, multi-departmental procedures to prevent self-excluded individuals from gambling at their licensed facility. However, at times, individuals evade detection, leading to Board penalties against casinos. The industry needs assistance from the Board to be able to more accurately and efficiently identify self-excluded individuals.

Reliance on government-issued credentials is required in other interactions in the gaming arena. For example, interactive gaming certificate holders or operators are required to “verify a player’s identify and record the government-issued credential examined” as part of the player’s account registration process. 58 Pa. Code § 812a.2. In addition, individuals requesting to be placed on the voluntary credit suspension list are required to present a government-issued ID when they submit a Request for Voluntary Credit Suspension Form. 58 Pa. Code § 609a.10(c). Many other agencies and institutions require provision of a name as shown on a government-issued ID. The Board requiring the same from individuals and reflecting that information on its official casino self-exclusion list, aligns with best practices across various sectors and institutions.

Taking all the forgoing into account, we respectfully request that the Board strengthen Sections 503a.2(b) and 503a.3(a) and (b) of its regulations so that we may be able to more accurately and efficiently identify self-excluded individuals. We are committed to continuously improve our self-exclusion procedures and urge the Board to help us eliminate pathways for self-excluded individuals to access gaming privileges.

Thank you in advance for giving your attention to this important matter.

Sincerely,

Craig Clark
Executive Vice President & General Manager
Live! Casino & Hotel Philadelphia

Sean Sullivan
Executive Vice President & General Manager
Live! Casino Pittsburgh

Eric Hausler
Chief Executive Officer
Parx Casino and Parx Casino Shippensburg