



Mille Lacs Band of Ojibwe Indians
Gaming Regulatory Authority
Office of Gaming Regulation and Compliance

August 24, 2018

NOTICE OF ADOPTION

Pursuant to 15 MLBSA § 305(b)(3), this serves as the official Notice of Adoption of the following:

Changes to:
DETAILED GAMING REGULATION 3,
Problem Gambling Prevention Program

Summary of changes:

1. Gaming Enterprise shall implement a System of Internal Controls (SICS) approved by the GRA Board.
2. All Gaming Enterprise Associates must be able to identify signs of problem gambling.
3. Updated tiered Referral System to include a Program Manager.
4. Expansion of associate communications.
5. Addition of restriction on alcoholic beverages.
6. Elaboration on patron information and education.
7. Self-exclusion process updated to include procedures preventing access to gaming services.

Pursuant to 15 MLBSA § 305(b)(3): The GRA reviewed comments received during the comment period, beginning July 11, 2018, and closing August 10, 2018. The GRA hereby responds to each comment below and makes changes where applicable.

Comment 1:

Part IV. ASSOCIATE TRAINING. Section 1 (C) Gaming Floor Resources and Gaming Enterprise Associates. (12), “Signs of problem gambling in the Gaming Enterprise...” and **(15),** “Problem and underage gambling awareness, recognition and first level patron assistance...” seem the same only with **(15)** being more descriptive. If same, combine or if different meanings are meant, keep separate and clarify.

GRA Response:

Agree a clarification should be made. The intent of requirement (12) is to be knowledgeable of the signs of problem gambling while (15) was intended for associates to be trained in exactly how to act on those signs. And for consistency the following change will be made:

DGR 3 IV Section 1 (C)(12) states, “Signs of problem *and underage* gambling in the Gaming Enterprise...”

DGR 3 IV Section 1 (C)(15) states, “Problem and underage gambling awareness, recognition and first level patron assistance ...”

Comment 2:

Part IV. ASSOCIATE TRAINING. Section 1 (C) Gaming Floor Resources and Gaming Enterprise Associates. (16), “Process to escalate Problem Gambling issues...” says the same thing as (5), “Processes to escalate Problem Gambling issues to Key Resources...” of the same section. Remove.

GRA Response:

Agree the requirements are the same and (16) will be removed.

Comment 3:

Part VII. EXCLUSIONS. Sections 7 & 8: Section 7 says the petitioner will be reviewed OR participate in an exit session. Section 8 says documentation of an exit session with the Key Resource Program Manager (KRPM) is required. Is Section 7 allowing a request to be reviewed without direct contact with the patron? If so, this seems to contradict Section 8.

GRA Response:

Agree a contradiction exists. For consistency and clarity the following change will be made:

***DGR 3 VII Section 7** states, “Removal from self-exclusion list. To be eligible for removal from the voluntary self-exclusion list, the petitioner must ~~either be reviewed by or~~ participate in an exit session with the Key Resource Program Manager. This must include a review of the risks and responsibilities of gambling and problem gambling and offer resources to the patron...”*

Comment 4:

Part VII. EXCLUSIONS. Section 8: Would, “All patrons requesting a lift of a voluntary self-exclusion must appear at the hearing in person. Nothing in this section compels the GRA to lift the exclusion...” better fit with Section 7?

GRA Response:

Agree that reorganizing Sections 7 – 9 would keep intent and clarify process. The following changes will be made:

***Section 7. Removal from self-exclusion list.** To be eligible for removal from the voluntary self-exclusion list, the petitioner must either be reviewed by or participate in an exit session with the Key Resource Program Manager. This must include a review of the risks and responsibilities of gambling and problem gambling and offer resources to the patron. Upon completion the Key Resource Program Manager shall sign off on the individual’s petition for removal from the list attesting to the fact that the exit session was conducted.*

***Section 8. Required meeting with Key Resource Program Manager.** All requests to have self-exclusions lifted, must have signed documentation of the exit session with the Key Resource Program Manager and be forwarded to the Executive Director of the OGR&C for consideration and issuance of a Compliance Determination pursuant to 15 MLBSA §*

Section 9. Petition for reinstatement. *A patron placed on the Exclusion List may submit a written petition for reinstatement to the GRA Board no more than once per year from date of self-exclusion.*

Section 7. Petition for removal from self-exclusion list. *A patron placed on the Exclusion List may submit a written petition for reinstatement to the GRA Board no more than once per year from date of self-exclusion.*

Section 9. Removal from self-exclusion list. All requests to have self-exclusions lifted, must have signed documentation of the exit session with the Key Resource Program Manager and be forwarded to the Executive Director of the OGR&C for consideration and issuance of a Compliance Determination pursuant to 15 MLBSA § 312. All patrons requesting a lift of a voluntary self-exclusion must appear at the hearing in person. Nothing in this section compels the GRA to lift the exclusion.

Part VII. EXCLUSIONS. Section 9: Previous sections use, “removal from self-exclusion list” instead of “reinstatement.”

Agree to change for consistency. See changes listed in Comment 4 above.

The GRA attached a red-line version illustrating the updates made as a result of reviewing the comments submitted. Copies of this regulation can be obtained at the GRA Office of Gaming Regulation & Compliance and at <http://www.millelacsband.com/government/gaming-regulatory-authority>.

Date 8/24/18



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PROBLEM GAMBLING PREVENTION PROGRAM

Document No. DGR – 3

Effective: August 24, 2018

I. SCOPE. For the purpose of meeting the Mille Lacs Band's responsibility to assist in the prevention and education of compulsive gambling, the Band has developed the following Problem Gambling Prevention Program to meet the needs of Gaming Enterprise patrons, associates, the local community and the state. In its role as a responsible member of the gaming industry, the Band recognizes there are social costs associated with problem gambling and is therefore committed to promoting responsible gaming for our patrons, our associates and our local community. Associates who gamble or consume alcohol at the Gaming Enterprise are susceptible to the risks and accountable to all requirements equivalent to a patron with respect to this regulation.

II. POLICIES APPLICABLE TO PROBLEM GAMBLING PREVENTION. A Gaming Enterprise shall comply with all requirements set forth in this regulation.

Section 1. The Gaming Enterprise shall implement a System of Internal Control Standards (SICS), as approved by the Gaming Regulatory Authority (GRA) Board.

Section 2. Subsequent revisions to the SICS must be provided to the GRA thirty (30) days prior to implementation.

Section 3. The GRA reserves the right to require changes to any internal control or procedure to ensure compliance with the following Problem Gambling Prevention Program and all other applicable laws and regulations.

Section 4. Problem Gambling Prevention SICS shall consist of the following:

- A. Referral System;
- B. Associate Training;
- C. Restrictions on Alcoholic Beverages;
- D. Patron Information and Education; and
- E. Exclusions.

III. REFERRAL SYSTEM. As a responsible member of the gaming industry and the local community, the Band is not only committed to promoting responsible gaming with its patrons and associates, but is also committed to promoting and supporting prevention and treatment programs, including the relationship with substance abuse within the community.

Section 1. Policies regarding a referral system based upon a current, computerized directory of organizations and individuals that have a reputation for providing effective assistance for individuals with gambling problems, including a process for referring patrons who seek help with such problems to resources listed in the directory and for encouraging them to take advantage of such resources. Policies must include:

- A. Direction on how Key Resources and Associates may make referrals to the State's Approved Gambling Treatment Providers;
- B. A readily available list of State Approved Gambling Treatment and Substance Abuse Providers to Key Resources and Associates; and
- C. A plan to promote and support issues related to prevention of Problem Gambling, underage gambling, substance abuse and options for treatment locally.

Section 2. Key Resource Program Manager. Mille Lacs Corporate Ventures (MLCV) will designate a main point of contact responsible to proactively administer the program and to ensure all internal and external questions and escalations are resolved satisfactorily. This program manager will serve as property and community liaisons and will also perform the following:



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- A. Maintain the Referral System;
 - B. Monitor the in-house incident system for problem and underage gambling prevention and ensure resolution;
 - C. Manage escalating incidents for patron and patron family related to Problem Gambling;
 - D. Provide resources, related to Problem Gambling prevention, underage gambling, including the relationship with substance abuse; including treatment and prevention programs;
 - E. Oversee implementation of the Problem Gambling Prevention Program;
 - F. Monitor the quantity and quality of problem gambling treatment available in the local community;
 - G. Routinely consult with experts in the prevention and treatment fields for the purpose of updating and modifying the Program as appropriate;
 - H. Monitor and evaluate the effectiveness of the program and solicit both associate and patron feedback;
 - I. Generate an annual report summarizing program activities and results for the previous year and recommendations for improvement or changes in the program as appropriate. A copy of this report will be submitted to the GRA Board annually; and
 - J. Oversee the development and distribution of all print and electronic information regarding the Program for associates, patrons and local community.

Section 3. Key Resources. Key Resources are those gaming leadership positions defined by MLCV as critical to the Problem Gambling Prevention Program. Key Resources will serve as property liaisons and will also perform the following:

- A. Utilize the Referral System;
- B. Use the in-house incident system for problem gambling prevention;
- C. Provide direct patron and family contact for incidents related to Problem Gambling;
- D. Offer resources, related to Problem Gambling prevention, including the relationship with substance abuse; including treatment and prevention programs; and
- E. Distribute all print and electronic information regarding the Program for associates, patrons and local community.

Section 4. Gaming Floor Resources. Gaming Floor Resources are those leadership positions defined by MLCV as those directly handling day to day contact with patrons and families of patrons with potential Problem Gambling concerns. They will further assess the situation and if necessary and appropriate, initiate a conversation with the patron in order to identify the patron's specific needs. They participate in the Referral System by assisting the patron directly in the following ways:

- A. Provide the patron with compulsive gambling or substance abuse brochures and business cards and assist in contacting the toll-free Helpline. The Helpline counselor will refer the patron or family members to the appropriate counseling services.
- B. Assist the patron with immediate practical needs by contacting relatives or friends.
- C. Explain and offer the self-exclusion option if the patron indicates a desire to cut back or stop gambling but feel they are unable to stay away from the Gaming Enterprise. Self-exclusion forms are available at the Gaming Enterprise management offices. By submitting the form, the patron's name will be removed from any marketing and promotion lists, have their check cashing capabilities discontinued, and have their access to wagering and player tracking accounts restricted.



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D. If Gaming Floor Resources determine further direct communication with the patron or patron's family member is necessary, they will communicate this to Key Resources for resolution by following the escalation process.

E. Document and retain incidents related to problem gambling.

Section 5. Gaming Enterprise Associates. Gaming Enterprise Associates may become aware of problem gambling through observation of problem gambling behavior in a patron, a request from a patron for assistance with a gambling problem, or a request from a friend or family member for assistance with a patron's gambling problem. In the event an Associate observes significant signs of problem gambling in a patron's behavior, the Associate should first contact a Gaming Floor Resource, but is also required to document for review by the Key Resource Program Manager. Associates will participate in the Referral System by being able to identify key indicators of problem gambling and reporting incidents to Gaming Floor Resources.

IV. ASSOCIATE TRAINING. Training is required for all associates on how to recognize the warning signs of potential and actual gambling problems and techniques for intervening constructively with compulsive behavior – problem gambling, underage gambling, alcohol abuse, and substance abuse.

Section 1. Annual training and semi-annual refreshers are required to ensure the highest level of professional training available for associates. This training must outline the tiered program, including escalation process, and meet the following subjects and requirements:

A. Key Resource Program Manager.

1. Provide structured training for Key Resources on issues;
2. Participate in yearly outside training to ensure program information is current and relevant; and
3. Routinely consult with experts in the prevention and treatment fields for the purpose of updating and modifying the Program as appropriate.

B. Key Resources.

1. Provide structured training for associates on issues;
2. Ensure associate trainings have been documented and retained for compliance; and
3. Execute a tiered program to escalate Problem Gambling issues to Key Resources program manager for final resolution.

C. Gaming Floor Resources and Gaming Enterprise Associates.

1. Techniques to be employed where compulsive behavior is identified or suspected;
2. Procedures to handle self-exclusions;
3. Practices to ensure that all incidents are documented;
4. Methods to prevent impaired patrons from gambling;
5. Processes to escalate Problem Gambling issues to Key Resources;
6. Prevalence of problem and underage gaming;
7. Relationship of problem gambling to compulsive behavior;
8. Social cost of problem gambling;
9. Vulnerable populations;
10. Cultural issues;
11. Associate gambling;
12. Signs of problem and underage gambling in the Gaming Enterprise;
13. Customer assistance and referral;



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- 14. Importance of proactively addressing problem and underage gambling; and
- 15. Problem and underage gambling awareness, recognition and first level patron assistance.

Section 2. New Associate training. Training for new Associates should be completed within thirty (30) days of hire and the topics addressed include:

- A. The Band's philosophy and commitment to promoting responsible gaming will be included in the associate handbook given to each new Associate;
- B. Signs and symptoms of problem gambling;
- C. Prevalence of problem and underage gambling;
- D. Relationship of problem gambling to substance abuse and other risk factors;
- E. Social costs of problem gambling;
- F. Child protection and safety;
- G. The Gaming Enterprises' policies and procedures for dealing with underage and problem gamblers; and
- H. Availability of counseling, treatment and support services.

Section 3. Regular Associate communications. Ongoing educational messages for Associates are intended to keep problem and underage gambling front of mind and should include the following:

- A. Posters calling attention to the issues of problem and underage gambling and the relationship to substance abuse will be prominently displayed in associate areas and around time clocks;
- B. Periodic communications, such as associate newsletters or back of house scrolling information screens, will be used to remind Associates about the issues of problem and underage gambling and the relationship to substance abuse; and
- C. Information regarding the confidential counseling services available to Associates through the Gaming Enterprises' Employee Assistance Program.

V. RESTRICTIONS ON ALCOHOLIC BEVERAGES. The Gaming Enterprise will ensure proper training of Associates involved in the service of alcoholic beverages and other Associates on the gaming floor to be able to recognize and deal with impairment.

Section 1. Procedures to prevent serving underage or impaired patrons. Processes must be implemented to prevent serving alcoholic beverage to underage or visibly intoxicated patrons. Gaming Enterprise areas serving alcoholic beverages must observe the following in all gaming areas:

- A. May not offer or deliver more than two drinks to one individual at a time (except that a bottle of wine or bucket of beer may be served to one or more patrons);
- B. May not sell, offer to sell or deliver to any person an unlimited number of drinks during any set period of time for a fixed price (i.e. open bar), except at invitation-only private functions not open to the public;
- C. May not increase the volume of alcoholic beverages contained in a drink without increasing proportionately the price regularly charged for such drink during the same calendar week;
- D. May not offer or deliver mixed drinks by the pitcher except to two or more patrons at any one time;
- E. May not encourage or permit any game or contest which involves drinking alcoholic beverages;
- F. May not serve an alcoholic beverage to any patron younger than 21 years old; and



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G. May not serve or distribute alcoholic beverages at the Gaming Enterprise between 2:00 a.m. and 8:00 a.m.

Section 2. Procedures to prevent impaired patrons from gaming. Processes must be implemented to ensure that visibly intoxicated or impaired patrons are not permitted to game further, receive check cashing or credit advance services, access wagering accounts or redemption of comp, script, or promotional items.

VI. PATRON INFORMATION AND EDUCATION. The Gaming Enterprise will provide patrons with printed and electronic information regarding problem and underage gambling, as well as information on counseling services through signs and promotional materials and/or one-on-one discussion. Materials should promote public awareness about the issues of problem and underage gambling and the relationship to substance abuse and include information on available services and resources to those who have a gambling problem.

Section 1. Informational resources available. Information and resources regarding Problem and underage gambling should be posted at gaming floor entrances, in restrooms, at bars, restaurants and in hotel rooms. Additionally, information and resources must be available on the Gaming Enterprise website, on all promotional mailers and on VGC communications.

Section 2. Informational signage. Areas of the Gaming Enterprise that serve alcohol and all public restrooms must post informational signage regarding the following at a minimum:

- A. Information regarding the responsible use of alcohol;
- B. Prohibited driving under the influence;
- C. Options to prevent impaired driving; and
- D. Resources for individuals struggling with alcohol and substance abuse.

Section 3. Readily available resources for patrons. Gaming Floor Resources must have information and resources readily available to provide to patrons when having conversations regarding problem gambling or substance abuse issues.

Section 4. Readily available resources for patrons and patron's families. Key Resources and the Key Resource Program Manager must have information and resources readily available to provide to patrons and patron's families when resolving problem gambling or substance abuse escalations.

VII. EXCLUSIONS. The Gaming Enterprises will have a process for patrons to request self-exclusion.

Section 1. If a patron elects to self-exclude, a Gaming Floor Resource must be contacted to assist and GRA prescribed forms must be used.

Section 2. Self-exclusion paperwork availability. Patrons must have access to self-exclusion paperwork via the Gaming Enterprise website.

Section 3. Procedures to prevent patron's access to gaming services. Measures must be immediately enacted to ensure voluntarily excluded persons do not receive check cashing, credit advance services or access to wagering accounts.

Section 4. Procedures to restrict access to player tracking account and mailers. All reasonable attempts to ensure that voluntarily excluded persons do not receive direct marketing or promotional calls/texts by restricting the player tracking account are immediately enacted. The process must be defined to ensure the player tracking account is restricted in such a way to



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prevent access to wagering accounts, redemption of comp, script, promotional items or any other player tracking club benefits.

Section 5. Exclusion process. Once the patron has completed the form and provided photo identification, the exclusion must follow procedure to ensure that the Director of the OGR&C is notified to for consideration and issuance of a Compliance Determination pursuant to 15 MLBSA § 312. The patron's placement on the Exclusion List is governed by the applicable provisions of the Act.

Section 6. Length of exclusion. An individual may select any of the following time periods as a minimum length of exclusion:

- A. Six months;
- B. One year;
- C. Three years;
- D. Five years; and
- E. Lifetime.

Section 7. Petition for removal from self-exclusion list. A patron placed on the Exclusion List may submit a written petition for reinstatement to the GRA Board no more than once per year from date of self-exclusion.

Section 8. Required meeting with Key Resource Program Manager. To be eligible for removal from the voluntary self-exclusion list, the petitioner must participate in an exit session with the Key Resource Program Manager. This must include a review of the risks and responsibilities of gambling and problem gambling and offer resources to the patron. Upon completion the Key Resource Program Manager shall sign off on the individual's petition for removal from the list attesting to the fact that the exit session was conducted.

Section 9. Removal from self-exclusion list. All requests to have self-exclusions lifted, must have signed documentation of the exit session with the Key Resource Program Manager and be forwarded to the Executive Director of the OGR&C for consideration and issuance of a Compliance Determination pursuant to 15 MLBSA § 312. All patrons requesting a lift of a voluntary self-exclusion must appear at the hearing in person. Nothing in this section compels the GRA to lift the exclusion.

Section 10.

Section 11. Reapplication. If the patron's request for removal from the self-exclusion list is denied, reapplication for removal is permitted only once per rolling calendar year.

Section 12. Associate self-exclusion. The Gaming Enterprise must share procedures for Associate self-exclusion and list maintenance to the GRA Board.

History.

Approved by Band Assembly on October 11, 2005.

Changes approved by the Gaming Regulatory Authority Board on November 4, 2010. Effective November 4, 2010.

Changes approved by the Gaming Regulatory Authority Board on April 28, 2016. Effective April 28, 2016.

Changes approved by the Gaming Regulatory Authority Board on August 24, 2018. Effective August 24, 2018.

Copies of prior versions of this regulation are available upon request from the Gaming Regulatory Authority.