



**WASHINGTON STATE GAMBLING  
COMMISSION SPECIAL MEETING  
January 5, 2023**

Washington State Liquor and Cannabis Board  
Olympia, Washington

## COMMISSIONERS



Alicia Levy  
Chair



Julia Patterson  
Vice Chair

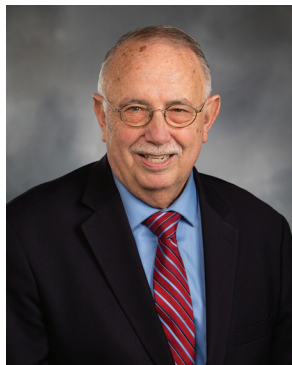


Bud Sizemore



Sarah Lawson

## EX OFFICIOS



Senator  
Steve Conway



Senator  
Jeff Holy



Representative  
Shelley Kloba



Representative  
Brandon Vick



### Washington State Gambling Commission

P.O. Box 42400 | Olympia, WA 98504-2400

(360) 486-3469 | (800) 345-2529 | [www.wsgc.wa.gov](http://www.wsgc.wa.gov)



WAGamblingCommission



WAGambling



wagambling





STATE OF WASHINGTON

GAMBLING COMMISSION

“Protect the Public by Ensuring that Gambling is Legal and Honest”

Gambling Commission Meeting Agenda

January 5, 2023

Meeting will be held virtually through Teams and in person at the Washington State Liquor and Cannabis Board 1025 Union Avenue SE Olympia, 98501

To join the meeting virtually through TEAMS Click here

Please note, agenda times are estimates only. Items may be taken out of sequence at the discretion of the Chair. Commissioners may take action on business items.

Administrative Procedures Act Proceedings are identified by an asterisk (\*)

Thursday, January 5, 2023 PUBLIC MEETING	
9:30 AM	Call to Order <span style="float: right;"><i>Alicia Levy, Chair</i></span>
9:35-10:30	<b>Executive Session – Closed to the Public</b> To discuss current and potential agency litigation with legal counsel, including tribal negotiations.
10:30 AM Tab 1	<b>Reconvene after Executive Session</b> <span style="float: right;"><i>Alicia Levy, Chair</i></span>  <b>*Consent agenda</b> <span style="float: right;"><b>(Action)</b></span> <ul style="list-style-type: none"> <li>November 9, 2022 Commission Meeting</li> <li>December 13, 2022 Special Commission Meeting Minutes</li> <li>New Licenses and Class III Employees</li> <li>Manufacturer Reports</li> <li>Sports Wagering Vendor Reports</li> <li>Non-profit officer working in multiple organizations</li> </ul> <i>Public Comment</i> <b>Director’s Report</b> <ul style="list-style-type: none"> <li>Recommendations for Improving Problem Gambling Prevention, Treatment &amp; Recovery in WA State (PGTF report to the legislature)</li> <li>HBCR Financial Statements for Fiscal Year 2021</li> </ul> <span style="float: right;"><i>Tina Griffin, Director</i></span>
Tab 2	<b>*Petition for Reconsideration – Potential Closed Session</b> <span style="float: right;"><b>(Action)</b></span> <ul style="list-style-type: none"> <li>The Pub Tavern, Case No. 2019-01481</li> </ul> <span style="float: right;"><i>Doug Van de Brake, Assistant Attorney General</i> <i>Andrea J. Clare, Attorney for the Petitioner</i></span>
Tab 3	<b>Budget Presentation</b> <ul style="list-style-type: none"> <li>2023 Financial Update</li> </ul> <span style="float: right;"><i>Kriscinda Hansen, Chief Financial Officer</i></span>

<b>Tab 4</b>	<p><b>*REQUEST TO INITIATE RULE MAKING</b> <span style="float: right;"><b>(Action)</b></span></p> <ul style="list-style-type: none"> <li>• Increase License Fees</li> </ul> <p style="text-align: right;"><i>Lisa McLean, Legislative Manager</i></p> <p><i>Public Comment</i></p>
<b>Tab 5</b>	<p><b>*REQUEST TO INITIATE RULE MAKING</b> <span style="float: right;"><b>(Action)</b></span></p> <ul style="list-style-type: none"> <li>• Sports Wagering License Fees</li> </ul> <p style="text-align: right;"><i>Lisa McLean, Legislative Manager</i></p> <p><i>Public Comment</i></p>
<b>Tab 6</b>	<p><b>*PETITION FOR DISCUSSION AND POSSIBLE FILING</b> <span style="float: right;"><b>(Action)</b></span></p> <ul style="list-style-type: none"> <li>• Wager Limits for House-Banked Card Games</li> </ul> <p style="text-align: right;"><i>Jess Lohse, Special Agent</i></p> <p><i>Public Comment</i></p>
<b>Tab 7</b>	<p><b>*PETITION FOR FINAL ACTION</b> <span style="float: right;"><b>(Action)</b></span></p> <ul style="list-style-type: none"> <li>• Pull-Tab Inventory Control</li> </ul> <p style="text-align: right;"><i>Jess Lohse, Special Agent</i></p> <p><i>Public Comment</i></p>
<b>Tab 8</b>	<p><b>2023 Legislative Session Update</b> <span style="float: right;"><b>(Possible Action)</b></span></p> <p style="text-align: right;"><i>Lisa McLean, Legislative Manager</i> <i>Tommy Oakes, Interim Legislative Liaison</i></p> <p><i>Public Comment</i></p>
	<p><b>Public Comment can be provided via:</b></p> <ul style="list-style-type: none"> <li>• Email before the start of the meeting on January 5, 2023, to <a href="mailto:askus@wsgc.wa.gov">askus@wsgc.wa.gov</a></li> <li>• Microsoft Office Teams Chat Box.</li> <li>• By phone; or</li> <li>• In person.</li> </ul>
	<b>Adjourn</b>

*Upon advance request, the Commission will pursue reasonable accommodations to enable persons with disabilities to attend Commission meetings. Questions or comments pertaining to the agenda, rule changes and requests for special accommodations should be directed to Julie Anderson, Executive Assistant at (360) 486-3453 or TDD (360) 486-363. If you would like to submit public comment via email, please submit them to [askus@wsgc.wa.gov](mailto:askus@wsgc.wa.gov)*

**Please silence your cell phones and mute your mics for the public meeting**



STATE OF WASHINGTON  
GAMBLING COMMISSION

*"Protect the Public by Ensuring that Gambling is Legal and Honest"*

November Gambling Commission Meeting Minutes  
Hybrid Meeting held at the  
Gambling Commission Lacey Headquarters  
November 9, 2022

**Commissioners Present:**

Chair Alicia Levy  
Bud Sizemore  
Kristine Reeves (Via Teams)

**Ex Officio Members Present:**

Senator Steve Conway (Via Teams)  
Representative Shelley Kloba (Via Teams)

**Staff Present:**

Tina Griffin, Director; Chris Wilson, Deputy Director; George Schultz, IT; Suzanne Becker, Assistant Attorney General (AAG) and Julie Anderson, Executive Assistant

**Staff Present Virtually:**

Gary Drumheller, Assistant Director; Julie Lies, Tribal Liaison; Jess Lohse, Acting Rules Coordinator; Tony Czar, Special Agent; Sonja Dolson, Special Agent Supervisor; Tommy Oakes, Interim Legislative Liaison; Jamie Doughty, Lab Administrator; Tyson Wilson, Special Agent Supervisor; Jenny Kapp, Special Agent

There were nine people in the audience and 37 people virtually.

**Tab 1**

**Consent Agenda**

Chair Levy asked the Commissioners if they had any changes to the consent agenda. There were none.

**Public Comment:**

Chair Levy asked for public comment. There was none.

*Commissioner Sizemore moved to approve the consent agenda as presented by staff.*

*Commissioner Reeves seconded the motion.*

*The motion passed. 3:0*

**Director's Report**

**Director Griffin** gave an update on the Washington State Adult Problem Gambling Program Study that was released by the Healthcare Authority. In the 2018 legislative session, the Gambling Commission was directed to contract a study to survey the scope of services available for pathological and problem gambling, problem gamblers and their families and analyze current prevention treatment and recovery programs and services in our state. The survey was conducted by WSU and University of Washington. The final report is due to the legislature within the next month. The Gambling Commission will continue to provide updates when we have it linked to

our website. She reminded the commissioners that on December 13<sup>th</sup>, the agency will have a special work session to discuss the agencies strategic plan. Director Griffin added that staff attended the Centennial Accord as well as Chair Levy. She closed her report by stating that Washington now has 12 sports books.

## **Tab 2**

### **Agency Request Legislation**

Tina Griffin, Director presented the materials for this tab. She stated that it has not been accepted by the governor's office at this point and based on feedback from legislators and the governor's office policy staff, staff made some non-substantive changes.

## **Tab 3**

### **Petition for Review – Proposed Order for Remand**

#### **Thu D. Le License No. 68-33533**

Tina Griffin, Director presented the materials for this tab. On May 3<sup>rd</sup>, 2022, the Office of Administrative Hearings held a Pre-Hearing Conference. In response to Ms. Le's prior request, an interpreter was present and interpreted the Pre-Hearing Conference between English and Vietnamese. Ms. Le appeared and represented herself. At the Pre-hearing conference, the Administrative Law Judge obtained the party's addresses of record and set a case schedule.

A Pre-hearing conference order and hearing notices for all scheduled hearings were mailed to the party's addresses of record. Commission Staff then filed a Motion for Summary Judgment, which was specifically provided for in the Pre-Hearing Conference Order for this case. Ms. Le did not appear for the Motion Hearing on Subject Summary Judgment on August 1<sup>st</sup>. OAH then issued an order dismissing Ms. Lee's appeal and granted the Commission Staff's motion for default.

Ms. Le, then, petitioned the Commission for review of OAH'S Order of Default and Dismissal requesting the hearing schedule be reinstated. Commission Staff do not oppose Ms. Le's timely petition for review and together, with Ms. Le, staff request that the Commission enter the proposed order amending the matter back to OAH to reinstate the case schedule.

**Chair Levy** asked if Ms. Le was present at the meeting and she was not.

*Commissioner Sizemore moved to approve the order for remand as presented by staff.*

*Commissioner Reeves seconded the motion.*

*Motion passed. 3:0*

## **Tab 4**

### **Rule for discussion and possible filing - WAC 230-14-260, Pull-Tab Inventory Control**

Jess Lohse, Acting Rules Coordinator, presented the materials for this tab. In June 2022, the commission received a petition from Tach Kim, Owner of Maker Street Bar and Grill in Kent, Washington. He was asking to amend WAC 230-14-260 related to pull-tab inventory control. At the August 2022 commission meeting, Commissioners accepted the petition and chose to initiate rule making to amend rules related to Pull-Tab Inventory Control, specifically, where the date placed into play must be recorded. Staff presented rule language for the commissioners to consider. Staff recommends filing for further discussion.



Chair Levy asked the Commissioners if they had any questions. Commissioners had no further questions. There were no public comments.

***Commissioner Sizemore moved to initiate rule-making by filing the rule as proposed for further discussion.***

***Commissioner Reeves seconded the motion.***

***The motion passed 3:0***

## **Tab 5**

### **Presentation – Special Olympics of Washington**

**Tony Czar, Special Agents** was joined by **Mary Do, Operating Officer and Mark Sinay, VP of Finance** to present this tab. **SA Czar** introduced Special Olympics of Washington and reported on the results of the 2022 enhanced raffle. Special Olympics of Washington have not received any complaints and operated the enhanced raffle within the plan approved by the Commission. Mary Do thanked the Commissioners for their continued support of this raffle for Special Olympics.

**Mary Do** presented the 2023 plan to the Commissioners. The raffle will kick off January 23, 2023 and the drawing will be held on May 12, 2023. The house is valued at nine million dollars.

**Chair Levy** asked if Commissioners had any questions.

**Commissioner Sizemore**, asked about the annuity option that was chosen last year. He asked if Special Olympics of Washington works with an investment firm or if they keep the money in their accounts. **Mark Sinay** replied that they work with Symetra to administer those funds.

**Chair Levy** asked if there were any public comments.

**Julie Anderson**, Executive Assistant read the public comment from the chat box into the record. *“Jeffrey says the grand prize advertised versus what is actually awarded is huge. Why up to the value of the prize when the prize advertised is never awarded?”*

**Mark Sinay** replied, *“In the rules it states how the prizes are awarded and that a certain number of tickets have to be sold before, for example, the house can be paid, given out as the prize. And as far as the cash piece, it's up to a certain amount that can be awarded. Again, everything is dependent on the number of tickets sold up until those thresholds for the house, for example, it's a 50/50 split with the profit unless they choose the annuity kind of thing. But in the rules, it's there's a lot of rules on it. There's a lot of writing on there, too, but it's pretty explicit with what threshold has to be reached before we can award the house, for example.”*

**Mary Do** also commented, *“Hi, Jeffrey, it's great to hear from you, again. So I think it's been really clear in the rules of what they are with increasing the house, is one. It hasn't been easy to find homes that are at that level. And so again, appreciative for the Commission and for approving that, the increase of the value of the homes for us.*

*And so I think when we talk about the thresholds, those are needed to also protect Special Olympics, Washington, as well. And obviously we would love to give away the grand prize because if we were able to meet those, that maximum amount of tickets, obviously, that's more delivery of impact for us and, obviously, a big win for the grand prize. So I think... A grand prize winner. So truthfully, we would love to*

*be able to give out that grand prize. So if we can keep selling those tickets, we can keep doing the delivery program and keep awarding prizes.”*

**Commissioner Reeves** asked about the disclaimers and notifications that the grand prize has never been awarded. **Mary Do**, replied that all the disclaimers are clearly marked and Special Olympics want to be completely transparent.

**Representative Kloba** asked if there was an average amount of tickets that you sell every year.

Mark Sinay replied, *“I did a five year look back. So starting in 2019, we have the raffle ticket and then we have the add on. So when we're saying certain number of tickets to sell, you have to have a raffle ticket, so that's what we use for our numbers. So for raffle tickets, it's been from 26,000 to 2019 to 46,000 in 2020, down to 39,000 in '21 and 36,020 in 2022. And the average price has been \$144 per transaction. So we're increasing the reach, but then with the pandemic, then, that started to take a big dive because we went from 46,000 to 39,000 in '21.*

*And we're now trying to rebuild that ticket base, and that's why we increased the value of the house, not just because, like Mary said, it's hard to find a house for that price and hoping that \$9 million will increase the activity around purchasing tickets because that's a higher price, that kind of thing. We are always wanting to sell more tickets because we get more cash flow from the revenue. So whatever we can do to sell tickets, we're always trying to do, and we only benefit if we sell more tickets.”*

**Julie Anderson**, Executive Assistant read the second public comment from the chat box into the record. *“Jeffrey said it's not clear to me, without digging deep in the website, that the grand prize isn't awarded. I wonder how many people believe the advertised price is actually awarded?”*

**Mary Do replied**, *“If you look at the disclaimer below, it'll say the net proceeds. So if he's looking for the actual, there's not an issue with us sharing that. I think we also want to protect the person, as well, in disclosing that information. So I feel what I would like to say, and I think this is, Jeffrey has reached out to Special Olympics multiple times, we've also have expressed the same thing. And so I'm not really sure, Jeffrey, what else you would like us to answer. We've had these conversations over the last several years.”*

**Commissioner Sizemore moved to approve Special Olympics of Washington to conduct a Dream House raffle as presented by staff and Special Olympics.**

**Commissioner Reeves seconded the motion.**

**The motion passed 3:0**

## **Tab 6**

### **Presentation – Electronic Raffle Update**

**Sonja Dolson, Special Agent Supervisor** presented a PowerPoint presentation to the Commissioners. The Electronic Raffle have been offered at two games so far.

**Representative Kloba** thanked SAS Dolson for all the data and asked if there had been any complaints so far with The Seahawks operating their first raffle. **SAS Dolson** answered that it has been smooth sailing so far.

**Chair Levy** thanked SAS Dolson for the presentation.

## Tab 7

### Presentation – 2022 Global Gaming Expo (G2E)

**Jamie Doughty, Lab Administrator, Tyson Wilson, Special Agent Supervisor and Jenny Kapp, Special Agent for the Tribal Gaming Unit** presented the materials for this tab. The G2E conference is held every year in October. The conference had approximately 25,000 attendees and approximately 300 vendors that attended.

**Senator Conway** asked how this information that was gathered at the conference interact with responsible gaming. He also asked about self-exclusion and digital wallets. Senator Conway said, *“It seems to me that the more we move into digital wallets and that we are opening up new avenues for people to gamble beyond their means, and I just hope that we have some ways of monitoring that”*.

Jamie Doughty and Jenny Kapp offered to do some research or look for more documentation for Senator Conway.

**Chair Levy** thanked the staff for setting up all the meetings and allowing her to tag along.

**Representative Kloba** added her experience at G2E. She spent the first two days at the problem gambling section that was co-sponsored by G2E. She shared some statistics. She said, *“90% of problem gamblers have a preexisting mental health or other substance related disorder prior to the onset of their gambling disorder. And so for me, that was really important to understand that if we're just focused on how many dollars we're spending on problem gambling, that's the wrong focus. We're just not asking the right question. So we need to make sure that we're looking a little more globally.*

*There was some good research presented on sports betting, and one of the things was that there is a lot more that, what do they call it, the cognitive fallacies about gambling that occur within sports betters. And so that they felt that education could really make a big difference, and it's the low hanging fruit that we could scale easily and pretty quickly. And there's already really good research on how to address the cognitive fallacies, and so I think that that would help to nip some things in the bud.*

*There was a great study of the problem gambling services that are provided across the United States that was done by National Association of Administrators of Disordered Gambling Services. 40 million people in the United States that have substance use disorder problems versus about 5 million, five and a half million who have problem gambling disorder. And so that is about seven times smaller. So seven times fewer people have just problem gambling than do have substance use. But when we look at the money that is spent on those conditions and the treatment, 31.8 billion of public funds, are both federal and state, are devoted to substance use disorder treatment. That's a pretty big number. And contrast that, 94 million is devoted to problem gambling treatment. So while there's seven times fewer problem gambling, or people with problem gambling disorder, we spend 338 times less on treatment. So it just reinforces that we have a lot of work to do. And so tying in with our problem gambling study and the recommendations that are coming forward, I think that is great and really important. Finally, spent a little time outside of the conference looking at other casinos, and I thought it was very*

*interesting to see the variety of amounts of floor space that seemed to be utilized for sports wagering. And I think, obviously, Las Vegas has had that opportunity for a very long time, and it's newer in the rest of the states. But we went to one casino brand new, I think in the last year. And it seemed like they were completely focused on sports wagering, including a giant two-story screen, and a big amount of floor area, as well as their entire pool area, which, in Las Vegas hotels, is a pretty extensive amount of pool facilities. And all of it was oriented and facing big jumbo tron screens that had sports playing on them. So it was just an interesting change in what you typically see in the big Las Vegas casinos.”*

**Commissioner Sizemore** also thanked staff for their hard work during their time in Vegas.

**Chair Levy** asked if there were any public comments. There were none. She then announced at 10:56 AM that the Commissioners would be going into Executive Session to discuss current and potential litigation with legal counsel, including tribal negotiations. Executive Session is expected to reconvene at 1:00 PM for the sole purpose of adjournment.

Executive Session adjourned at **12:37 PM** and **Chair Levy** announced that the next commission meeting would be a special meeting on December 13, 2022, at the Gambling Commission Headquarters and the meeting will start with Executive Session beginning at 9:30 AM.





STATE OF WASHINGTON  
GAMBLING COMMISSION

*"Protect the Public by Ensuring that Gambling is Legal and Honest"*

**December Special Gambling Commission Meeting Minutes  
Hybrid Meeting  
December 13, 2022**

**Commissioners Present:**

**Chair Alicia Levy  
Vice Chair Julia Patterson (Via Teams)  
Kristine Reeves (Via Teams)  
Sarah Lawson (Via Teams)**

**Ex Officio Members Present:**

**Senator Jeff Holy (Via Teams)**

**Staff Present:**

Chris Wilson, Deputy Director and Julie Anderson, Executive Assistant

**Staff Present Virtually:**

Tina Griffin, Director

There were 0 public attendance and 27 attended virtually.

**Tab 1**

**Strategic Plan Work Session**

Director Griffin presented the materials for this tab. Commissioners heard the proposed draft materials and suggested staff continue to work on the tactics and performance measures of the plan to present to them before June for final approval.

The meeting adjourned at 11:47 AM.



COMMISSION APPROVAL LIST  
(New Licenses & Class III Gaming Employees)  
January 2023

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Based upon the licensing investigations, staff recommends approving all new Licenses and Class III employees listed on pages 1 to 29.

ORGANIZATION NAME

LICENSE NUMBER

PREMISES LOCATION

**NEW APPLICATIONS****BINGO**

KING'S WAY CHRISTIAN SCH/1ST CHR OF GOD  
00-21494 01-02823

3300 NE 78TH ST  
VANCOUVER WA 98665-0656

SEABECK COMMUNITY CENTER  
00-24997 01-02820

15565 SEABECK HWY NW  
SEABECK WA 98380

VFW 07824  
00-09879 01-02278

400 N ANDRESEN RD  
VANCOUVER WA 98661

**RAFFLE**

AMERICAN LEGION 00092  
00-00311 02-01251

26921 88TH AVE NW  
STANWOOD WA 98292

COMPASS HEALTH  
00-24284 02-20941

10200 QUIL CEDA BLVD  
TULALIP WA 98271-9163

COYOTE CENTRAL  
00-23799 02-20672

2300 E CHERRY ST  
SEATTLE NA 98122

DELTA WATERFOWL FOUNDATION  
00-25020 02-21285

1412 BASIN AVE  
BISMARCK ND 58504

FEDERAL WAY CHORALE  
00-25017 02-21283

31510 PETE VON REICHBAUER  
FEDERAL WAY WA 98003

FOE AUX 03862  
00-15588 02-02627

411 S 1ST ST  
SHELTON WA 98584

JUNIOR LEAGUE OF SEATTLE A NONPROFIT CORPORATION  
00-00715 02-01111

20424 25TH AVE NW  
SHORELINE WA 98177

LUMA GUILD  
00-23069 02-09332

200 UNIVERSITY ST  
SEATTLE WA 98124

MT. RAINIER FUTBOL CLUB  
00-24998 02-21276

777 MAIN STREET  
BUCKLEY NA 98321

SENIOR CENTER/WEST SEATTLE  
00-00038 02-08389

4217 SW OREGON ST  
SEATTLE WA 98116-4235

SKAGIT COUNTY HISTORICAL SOCIETY  
00-20400 02-08605

103 COMMERCIAL  
LA CONNER WA 98257

THEREAPEUTIC RIDING OF TRI-CITIES  
00-24995 02-21275

104 E 41ST PL  
KENNEWICK WA 99337

ORGANIZATION NAME

LICENSE NUMBER

PREMISES LOCATION

**NEW APPLICATIONS****RAFFLE**VIKING CREW OF SELAH  
00-24230 02-20913801 N 1ST ST  
SELAH WA 98942WASHINGTON YOUTH ACADEMY FOUNDATION  
00-23721 02-096886947 COAL CREEK PKWY SE  
NEWCASTLE WA 98312**PUNCHBOARD/PULL-TAB COMMERCIAL STIMULANT**ALL IN SALOON  
00-25004 05-217961315 COMMERCE AVE STE 120  
LONGVIEW WA 98632BANK TAVERN  
00-24899 05-21762226 2ND ST NW  
EPHRATA WA 98823BIG RICKS  
00-24879 05-21754819 W 3RD AVE  
MOSES LAKE WA 98837DUCKS AND DRAKES  
00-24930 05-21771221 8TH ST SUITE 1  
LEAVENWORTH WA 98226FARRELLI'S PIZZA  
00-24965 05-21786813 W YELM AVE  
YELM WA 98597HARVEY'S TAVERN  
00-24980 05-2178921116 HWY 99  
EDMONDS WA 98026JACKS  
00-25008 05-217972425 AUBURN WAY N  
AUBURN WA 98002MAIN STREET BAR AND GRILL  
00-25016 05-217982005 MAIN ST  
FERNDALE WA 98248MOON'S MONGOLIAN GRILL AND BAR  
00-24991 05-217936429 N DIVISION ST  
SPOKANE WA 99208THE 884 PUB  
00-25023 05-21801757 S NATIONAL AVE  
BREMERTON WA 98312**MANUFACTURER**COUNTR GMBH  
20-00218 20-00218FAHRENHEITSTR 6  
KLEINMACHNOW NA 14532INTERBLOCK LUXURY GAMING PRODUCTS  
20-00270 20-00270GORENJSKA CESTA 23  
MENGEN NA 1234



ORGANIZATION NAME

LICENSE NUMBER

PREMISES LOCATION

**NEW APPLICATIONS**

**GAMBLING SERVICE SUPPLIER**

EQUITY FUNDING  
00-25010 26-00375

13401 BEL-RED RD STE A7  
BELLEVUE WA 98005

SEATTLE CASINO & POKER RENTALS  
00-25024 26-00377

345 N ERIC DR  
PALATINE IL 60037

**MAJOR SPORTS WAGERING VENDOR**

PENN SPORTS INTERACTIVE, LLC  
10-00230 81-00013

1818 MARKET STREET 13TH FLOOR  
PHILADELPHIA PA 19103

**MID-LEVEL SPORTS WAGERING VENDOR**

IMG ARENA US, LLC  
10-00341 82-00027

11 MADISON AVE  
NEW YORK NY 10010

NEOGAMES SOLUTIONS LLC  
10-00305 82-00024

10 HABARZEL ST  
TEL AVIV 6971014

**ANCILLARY SPORTS WAGERING VENDOR**

GEOCOMPLY SOLUTIONS INC.  
10-00080 83-00033

545 ROBSON ST STE 500  
VANCOUVER BC V6B 1A6

NOVOMATIC AMERICAS SALES LLC  
10-00295 83-00028

1050 E BUSINESS CENTER DRIVE  
MOUNT PROSPECT IL 60056

WORLDPAY GAMING SOLUTIONS  
10-00236 83-00013

8500 GOVERNORS HILL DR  
CINCINNATI OH 45249

YOURPAY, LLC  
10-00320 83-00030

2900 WESTSIDE PARKWAY  
ALPHARETTA GA 30004

PERSON'S NAME  
LICENSE NUMBER

EMPLOYER'S NAME  
PREMISES LOCATION

### NEW APPLICATIONS

#### DISTRIBUTOR REPRESENTATIVE

CAMITAN, ARNEL J  
22-01243

JCM GLOBAL  
LAS VEGAS NV 89119-3728

SCHWIDERSKI, JAMIE M  
22-01322

JCM GLOBAL  
LAS VEGAS NV 89119-3728

#### MANUFACTURER REPRESENTATIVE

ANDUJAR, ANGEL L JR  
23-03562

SCIENTIFIC GAMES  
LAS VEGAS NV 89119

BHASKER, RITHESH  
23-03553

SCIENTIFIC GAMES  
LAS VEGAS NV 89119

BURNS-COLLINS, SHELLYANN K  
23-03546

IGT  
LAS VEGAS NV 89113

CORONA, JOSHUA R  
23-03555

ARIES TECHNOLOGY LLC  
GROVE OK 74344-6251

DAVIS, JUSTYN A  
23-03130

EVERI PAYMENTS INC  
LAS VEGAS NV 89113-2175

DORSEY, JOHNATHAN A  
23-03548

IGT  
LAS VEGAS NV 89113

DUNCAN, MEGAN E  
23-03551

ARISTOCRAT TECHNOLOGIES INC  
LAS VEGAS NV 89135

EASON, BILLY J JR  
23-01563

ARISTOCRAT TECHNOLOGIES INC  
LAS VEGAS NV 89135

GANESAN, ARUN BROWN  
23-03560

SCIENTIFIC GAMES  
LAS VEGAS NV 89119

GARCIA, RICARDO J  
23-03564

IGT  
LAS VEGAS NV 89113

GARCIA, ROLDOLFO  
23-03257

PASSPORT TECHNOLOGY USA INC  
GLENDALE CA 91203

GIORDANO, JOHN J  
23-03545

ARISTOCRAT TECHNOLOGIES INC  
LAS VEGAS NV 89135

GOODMAN, GREGORY M  
23-03556

IGT  
LAS VEGAS NV 89113

PERSON'S NAME  
LICENSE NUMBER

EMPLOYER'S NAME  
PREMISES LOCATION

**NEW APPLICATIONS**

**MANUFACTURER REPRESENTATIVE**

HORNE, DEELACEYIA S  
23-03544

ACRES MANUFACTURING COMPANY  
LAS VEGAS NV 89113

KANNAN, PRAGASH  
23-03561

SCIENTIFIC GAMES  
LAS VEGAS NV 89119

KEHN, AUSTIN J  
23-02970

VIDEO KING  
OMAHA NE 68154

KOILRAJ, JEYASINGH  
23-03535

SCIENTIFIC GAMES  
LAS VEGAS NV 89119

LEGASPI, NIKKO A  
23-03547

AINSWORTH GAME TECHNOLOGY INC  
LAS VEGAS NV 89118

MARTIN, JOSEPH R  
23-03552

ARIES TECHNOLOGY LLC  
GROVE OK 74344-6251

MOHAN, SARANYA  
23-03536

SCIENTIFIC GAMES  
LAS VEGAS NV 89119

NADUVIL KANDIYIL, ASWATHI  
23-03563

SCIENTIFIC GAMES  
LAS VEGAS NV 89119

NELSON, MITCHELL A  
23-03557

ARISTOCRAT TECHNOLOGIES INC  
LAS VEGAS NV 89135

NORMAN, ERIK E  
23-03542

IGT  
LAS VEGAS NV 89113

PHAM, PHU  
23-03538

PASSPORT TECHNOLOGY USA INC  
GLENDALE CA 91203

PICA, JAMIE L  
23-03554

EVERI PAYMENTS INC  
LAS VEGAS NV 89113-2175

POELLNITZ, MICHAEL L  
23-03537

SCIENTIFIC GAMES  
LAS VEGAS NV 89119

PRABHAKAR, GOKUL RAJ  
23-03550

SCIENTIFIC GAMES  
LAS VEGAS NV 89119

RAGHAVAN, PRASHANTH  
23-03559

SCIENTIFIC GAMES  
LAS VEGAS NV 89119

RAJENDIRAN, SANTHOSH KUMAR  
23-03533

SCIENTIFIC GAMES  
LAS VEGAS NV 89119

PERSON'S NAME  
LICENSE NUMBER

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PREMISES LOCATION

### NEW APPLICATIONS

#### MANUFACTURER REPRESENTATIVE

RAMASWAMI, PASHUPATI 23-03532	SCIENTIFIC GAMES LAS VEGAS NV 89119
RAVI SINGARAVELU, PRAVEEN KUMAR 23-03558	SCIENTIFIC GAMES LAS VEGAS NV 89119
SAGOO, TARA S 23-03525	PASSPORT TECHNOLOGY USA INC GLENDALE CA 91203
SEKARAN, YAMINI 23-03534	SCIENTIFIC GAMES LAS VEGAS NV 89119
SERCENA, RHIO P 23-03540	PASSPORT TECHNOLOGY USA INC GLENDALE CA 91203
SIMS-TARVER, NIKKOLE A 23-03531	ARISTOCRAT TECHNOLOGIES INC LAS VEGAS NV 89135
TSO, DAVID W 23-03539	PASSPORT TECHNOLOGY USA INC GLENDALE CA 91203
VANCE, LAURA D 23-03549	SCIENTIFIC GAMES LAS VEGAS NV 89119
VELASCO, SHELYN F 23-03530	ARISTOCRAT TECHNOLOGIES INC LAS VEGAS NV 89135
YOUNG, CHARLES S 23-03541	IGT LAS VEGAS NV 89113

#### CALL CENTER REPRESENTATIVE

DURANT, ASHLEY M 32-00073	INCEPT CORPORATION CANTON OH 44718
GATEWOOD, STEVEN L 32-00070	INCEPT CORPORATION CANTON OH 44718
LUNSFORD, TRAVIS I 32-00072	INCEPT CORPORATION CANTON OH 44718
MANN, MICHELLE M 32-00071	INCEPT CORPORATION CANTON OH 44718



PERSON'S NAME  
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**NEW APPLICATIONS**

**MAJOR SPORTS WAGERING REPRESENTATIVE**

AGUILAR, MAXIME  
33-00468

NYX DIGITAL GAMING (USA), LLC  
BEVERLY HILLS CA 90210

BAKER, WILLIAM J  
33-00470

BETFRED SPORTS  
LAS VEGAS NV 89103

BRODZELLER, CHARLES M  
33-00479

IGT  
LAS VEGAS NV 89113

BULMER, JASON V  
33-00463

IGT  
LAS VEGAS NV 89113

CASTILLO, MICHAEL  
33-00378

DRAFTKINGS  
BOSTON MA 02116

CHAUDRY, ATIF B  
33-00289

PENN SPORTS INTERACTIVE, LLC  
PHILADELPHIA PA 19103

CHEAN, BENNY C  
33-00466

NYX DIGITAL GAMING (USA), LLC  
BEVERLY HILLS CA 90210

FITZMAURICE, JAMES P  
33-00467

NYX DIGITAL GAMING (USA), LLC  
BEVERLY HILLS CA 90210

FREDERICK, TUCKER E  
33-00482

BETFRED SPORTS  
LAS VEGAS NV 89103

GLEASON, THOMAS A  
33-00471

NYX DIGITAL GAMING (USA), LLC  
BEVERLY HILLS CA 90210

HERNANDEZ, RAUL R  
33-00462

IGT  
LAS VEGAS NV 89113

KEATHLEY, DEREK B  
33-00481

BETFRED SPORTS  
LAS VEGAS NV 89103

KURASZ, MICHAEL T  
33-00290

PENN SPORTS INTERACTIVE, LLC  
PHILADELPHIA PA 19103

MARKOWSKI, MATTHEW R  
33-00465

IGT  
LAS VEGAS NV 89113

NORMAN, ERIK E  
33-00464

IGT  
LAS VEGAS NV 89113

NOVAK, PAUL  
33-00291

PENN SPORTS INTERACTIVE, LLC  
PHILADELPHIA PA 19103

PERSON'S NAME  
LICENSE NUMBER

EMPLOYER'S NAME  
PREMISES LOCATION

**NEW APPLICATIONS**

**MAJOR SPORTS WAGERING REPRESENTATIVE**

PAVLOVIC, MILOS  
33-00473

IGT  
LAS VEGAS NV 89113

PURUSHOTHAM, BALAJI  
33-00472

NYX DIGITAL GAMING (USA), LLC  
BEVERLY HILLS CA 90210

QUIGLEY, IAN R  
33-00476

DRAFTKINGS  
BOSTON MA 02116

RUTHERFORD, KHYRE R  
33-00457

DRAFTKINGS  
BOSTON MA 02116

SCHEIN, STEVEN D  
33-00469

IGT  
LAS VEGAS NV 89113

STEFANOVIC, MILOS  
33-00089

IGT  
LAS VEGAS NV 89113

STRZEMP, JOHN  
33-00412

DRAFTKINGS  
BOSTON MA 02116

TROMBETTA, FRANCO N  
33-00480

DRAFTKINGS  
BOSTON MA 02116

WHITE, BRENNAN R  
33-00474

DRAFTKINGS  
BOSTON MA 02116

WILSON, MARCUS W  
33-00461

IGT  
LAS VEGAS NV 89113

ZIMNY, ERICH D  
33-00288

PENN SPORTS INTERACTIVE, LLC  
PHILADELPHIA PA 19103

**MID-LEVEL SPORTS WAGERING REPRESENTATIVE**

DIEHL, TOBIAS  
34-00017

BULLETPROOF SOLUTIONS INC  
FAIRFAX VA 22031

DIRK, BRIAN  
34-00009

DRUVSTAR  
LAS VEGAS NV 89119

MOHIUDDIN, MOHAMMED W  
34-00018

BULLETPROOF SOLUTIONS INC  
FAIRFAX VA 22031

PERSON'S NAME  
LICENSE NUMBER

EMPLOYER'S NAME  
PREMISES LOCATION

**NEW APPLICATIONS**

**ANCILLARY SPORTS WAGERING REPRESENTATIVE**

VAUGHAN, STACI A  
35-00035

UNITED TOTE COMPANY  
LOUISVILLE KY 40222

WATKINS, JOSEPH S  
35-00036

WORLDPAY GAMING SOLUTIONS  
CINCINNATI OH 45249

**NON-PROFIT GAMBLING MANAGER**

GIBSON, SANDRA J  
61-04817

FOE 02338  
PORT ORCHARD WA 98366

PONTNAK, MICHELLE R  
61-04818

LOOM 01666  
NORTH BEND WA 98045

WESTON, KENNETH W  
61-04819

AMERICAN LEGION 00209  
MOSES LAKE WA 98837

YBARRA, BRIANNE K  
61-04711

FOE 02218  
CHELAN WA 98816

ZORN, BERNELL L JR  
61-04820

VFW 01263  
RENTON WA 98057-2551

**SERVICE SUPPLIER REPRESENTATIVE**

AGUILAR, ARMANDO  
63-00859

DALLMEIER ELECTRONIC USA  
LAS VEGAS NV 89102

BATAWALA, MEHDI M  
63-01076

SALISHAN-MOHEGAN LLC  
VANCOUVER WA 98660

BRYANT, JOSHUA J  
63-01073

MAVERICK WASHINGTON  
KIRKLAND WA 98034

DIEHL, TOBIAS  
63-01075

BULLETPROOF SOLUTIONS INC  
FAIRFAX VA 22031

LAM, KHOI H  
63-01074

MAVERICK WASHINGTON  
KIRKLAND WA 98034

LEAUNVANKHAM, DAENG  
63-00808

DALLMEIER ELECTRONIC USA  
LAS VEGAS NV 89102

VANDEVENTER, JENNIFER E  
63-01078

MAVERICK WASHINGTON  
KIRKLAND WA 98034

PERSON'S NAME  
LICENSE NUMBER

EMPLOYER'S NAME  
PREMISES LOCATION

### NEW APPLICATIONS

#### SERVICE SUPPLIER REPRESENTATIVE

WRIGHT, JONATHAN E  
63-00988

RELIABLE SECURITY SOUND & DATA  
EVERETT WA 98206-1295

#### CARD ROOM EMPLOYEE

ACEVEDO RODRIGUEZ, JOSE D  
68-36378

B

CASINO CARIBBEAN  
YAKIMA WA 98901

ADDO, JOSIAH E  
68-36959

B

GREAT AMERICAN CASINO/LAKEWOOD  
LAKEWOOD WA 98499

ALMY, NICOLAS S  
68-37003

B

CASINO CARIBBEAN  
KIRKLAND WA 98034

ATKINS, JA'KORIE A  
68-36958

B

CRAZY MOOSE CASINO/PASCO  
PASCO WA 99301

BERTEN, LILLIAN L  
68-36969

B

THE PALACE  
LA CENTER WA 98629

BOWMAN, AMANDA Y  
68-36977

B

JOKER'S CASINO SPORTS BAR & FIESTA  
RICHLAND WA 99352-4122

CARNAHAN, BEAU R  
68-34808

B

JOKER'S CASINO SPORTS BAR & FIESTA  
RICHLAND WA 99352-4122

CHARBONNEAU, SHANANDOAH S  
68-36982

B

LILAC LANES & CASINO  
SPOKANE WA 99208-7393

CHEN, CHAOQUN  
68-36971

B

ROMAN CASINO  
SEATTLE WA 98178

CHOU, I HA  
68-35521

B

ROMAN CASINO  
SEATTLE WA 98178

CHRISTMAN, JOSHUA R  
68-16631

B

CRAZY MOOSE CASINO II/MOUNTLAK  
MOUNTLAKE TERRACE WA 9804

COATS, ADAM K  
68-13547

B

HOLLYWOOD CARDROOM  
SHORELINE WA 98133

COLE, KELLY J  
68-36991

B

BUZZ INN STEAKHOUSE/EAST WENATCH  
EAST WENATCHEE WA 98802

CRUMP, CRYSTAL M  
68-36983

B

WILD GOOSE CASINO  
ELLENSBURG WA 98926

PERSON'S NAME  
LICENSE NUMBER

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**NEW APPLICATIONS**

**CARD ROOM EMPLOYEE**

DAVIS, GRACELYN R 68-18403	B	JOKER'S CASINO SPORTS BAR & FIESTA RICHLAND WA 99352-4122
DAVIS, RICKEY 68-36961	B	LILAC LANES & CASINO SPOKANE WA 99208-7393
DEMING, COLIN M 68-36980	B	RIVERSIDE CASINO TUKWILA WA 98168
DODDS, TEDERRAL C 68-36986	B	THE PALACE LA CENTER WA 98629
ECKERT, ANTHONY R 68-10548	B	RED DRAGON CASINO MOUNTLAKE TERRACE WA 98041
GARRISON, DAVID V 68-06636	B	CASINO CARIBBEAN KIRKLAND WA 98034
GASSELING, RANDALL J 68-36994	B	GOLDIES SHORELINE CASINO SHORELINE WA 98133
GILECK, DERRICK S 68-07747	B	BLACK PEARL RESTAURANT & CARD I SPOKANE VALLEY WA 99206-4719
GILL, TRACY L 68-36998	B	SILVER DOLLAR CASINO/RENTON RENTON WA 98057
GUZMAN RODRIGUEZ, MARIA D 68-36954	B	BUZZ INN STEAKHOUSE/EAST WENATCHEE EAST WENATCHEE WA 98802
HARRISON, MICHAEL E JR 68-36968	B	BLACK PEARL RESTAURANT & CARD I SPOKANE VALLEY WA 99206-4719
HO, KAREN T 68-33717	B	THE PALACE LA CENTER WA 98629
HUANG, JIA YIN 68-36997	B	SILVER DOLLAR CASINO/RENTON RENTON WA 98057
HUANG, LI-YI 68-22660	B	FORTUNE CASINO - TUKWILA TUKWILA WA 98168
HUGHES, JERRY L 68-36990	B	SLO PITCH PUB & EATERY BELLINGHAM WA 98225
ISADORE, TYLENE E 68-33863	B	CLEARWATER SALOON & CASINO EAST WENATCHEE WA 98802

PERSON'S NAME  
LICENSE NUMBER

EMPLOYER'S NAME  
PREMISES LOCATION

**NEW APPLICATIONS**

**CARD ROOM EMPLOYEE**

KATAOKA, MATTHEW I 68-35531	B	FORTUNE POKER RENTON WA 98057
KHAMVISETH, TIMOTHY S 68-36952	B	GREAT AMERICAN CASINO/TUKWILA TUKWILA WA 98168
KIM, PHALY 68-04306	B	MACAU CASINO TUKWILA WA 98188
LAIRD, ALEXANDER P 68-36956	B	CASINO CARIBBEAN KIRKLAND WA 98034
LATHWELL, JACK D 68-36989	B	ZEPPOZ PULLMAN WA 99163
LAW, PETER A 68-37009	B	BLACK PEARL RESTAURANT & CARD I SPOKANE VALLEY WA 99206-4719
LEE, ESTHER H 68-19579	B	JAMESTOWN SALOON ARLINGTON WA 98223
LEWIS, KELLY C 68-36987	B	PALACE CASINO LAKEWOOD LAKEWOOD WA 98499-8434
LI, LIFEN 68-36955	B	ROMAN CASINO SEATTLE WA 98178
MAI, WENWEN 68-35070	B	RIVERSIDE CASINO TUKWILA WA 98168
MASTRACCI, NICOLAS P 68-36995	B	CASINO CARIBBEAN KIRKLAND WA 98034
MAXEY, RICKY D 68-31334	B	NOB HILL CASINO YAKIMA WA 98902
MAYDAHL, JAMES A 68-25869	B	LANCER LANES/REST AND CASINO CLARKSTON WA 99403-2219
MCCARRON, KIM W 68-36996	B	CASINO CARIBBEAN KIRKLAND WA 98034
NGO, KHOA M 68-28802	B	FORTUNE POKER RENTON WA 98057
NGO, KIM I 68-31082	B	FORTUNE POKER RENTON WA 98057

PERSON'S NAME  
LICENSE NUMBER

EMPLOYER'S NAME  
PREMISES LOCATION

**NEW APPLICATIONS**

**CARD ROOM EMPLOYEE**

NGUYEN, HAI T 68-36953	B	MACAU CASINO LAKEWOOD WA 98499-4457
NGUYEN, KIM SINH T 68-36965	B	GOLDIES SHORELINE CASINO SHORELINE WA 98133
NHEAN, PAUL 68-25204	B	FORTUNE POKER RENTON WA 98057
OLDHAM, BAILEY H 68-36853	B	FORTUNE CASINO - LACEY LACEY WA 98516
OLIVER, LUCIANA M 68-36993	B	FORTUNE CASINO - RENTON RENTON WA 98055
OUNG, JALILA R 68-17308	B	RIVERSIDE CASINO TUKWILA WA 98168
PATH, PISEY 68-36960	B	GREAT AMERICAN CASINO/LAKEWOOD LAKEWOOD WA 98499
PAULING, KIERSTEN M 68-36261	B	LILAC LANES & CASINO SPOKANE WA 99208-7393
POMAREDA, AMBER R 68-36988	B	ROXY'S BAR & GRILL SEATTLE WA 98126
PORCELLI, DANIEL W 68-36972	B	ROMAN CASINO SEATTLE WA 98178
RAQUIZA, MICHAEL A 68-36940	B	IMPERIAL PALACE CASINO AUBURN WA 98002
ROCHE, JUSTIN T 68-35384	B	BLACK PEARL RESTAURANT & CARD I SPOKANE VALLEY WA 99206-4719
ROGERS, LARRY C JR 68-36970	B	FORTUNE CASINO - LACEY LACEY WA 98516
SANG, SOVANKIRY 68-36975	B	ROMAN CASINO SEATTLE WA 98178
SAYAHOD, PHANOMPHONE 68-12817	B	IMPERIAL PALACE CASINO AUBURN WA 98002
SCHONER, MICHAEL J 68-36978	B	COYOTE BOB'S CASINO KENNEWICK WA 99336

PERSON'S NAME  
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**NEW APPLICATIONS**

**CARD ROOM EMPLOYEE**

SCOTT, TESLA R 68-36948	B	FORTUNE CASINO - LACEY LACEY WA 98516
SOLIS, HANNAH M 68-36999	B	ALL STAR CASINO SILVERDALE WA 98383
SOTO, JAVIER J 68-30685	B	COYOTE BOB'S CASINO KENNEWICK WA 99336
THIM, LEAN T 68-36966	B	FORTUNE CASINO - RENTON RENTON WA 98055
THOMPSON, ROBERT E JR 68-21085	B	CASINO CARIBBEAN YAKIMA WA 98901
TORRES GUILLEN, ARMANDO 68-36985	B	BUZZ INN STEAKHOUSE/EAST WENAT EAST WENATCHEE WA 98802
TRAN, LY T 68-36964	B	GREAT AMERICAN CASINO/TUKWILA TUKWILA WA 98168
TRAN, TUAN TAYLOR T 68-36984	B	CLUB 48 YAKIMA WA 98908
TU, XING 68-36973	B	ROMAN CASINO SEATTLE WA 98178
TUCKER, CHRISTOPHER W 68-37001	B	JOKER'S CASINO SPORTS BAR & FIEST RICHLAND WA 99352-4122
TURNER, BLAKE A 68-36962	B	JAMESTOWN SALOON ARLINGTON WA 98223
WALKER, JAMAAR L 68-36967	B	SILVER DOLLAR CASINO/RENTON RENTON WA 98057
WEIGEL, JESSE S 68-36981	B	LILAC LANES & CASINO SPOKANE WA 99208-7393
WHITE, SAKIENA R 68-36992	B	RIVERSIDE CASINO TUKWILA WA 98168
WILLOUGHBY, CHRISTOPHER J 68-30689	B	THE PALACE LA CENTER WA 98629



PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

**NEW APPLICATIONS**

**CLASS III GAMING EMPLOYEE**

**CHEHALIS CONFEDERATED TRIBES**

BARROS, SUZZANE L  
69-53796

COLLINS, RACHAEL A  
69-53627

KENDALL, MELODY D  
69-53880

LAMPING, GHARRETT C  
69-53890

MCKASSON, MITCHELL W  
69-53631

ROBBINS, MICHAEL L  
69-53879

SCHNEIDER-OUIMBY, JESSICA L  
69-53643

SMITH, CERRENTITY T  
69-53568

TIPPETT, BRYCEN L  
69-38422

WHITE, GEORGE T  
69-53787

WILLIAMS, RICHARD A III  
69-53786

**COLVILLE CONFEDERATED TRIBES**

AREVALO GARCIA, FLAVIO C  
69-50647

EVERYBODYTALKSABOUT, DEANA P  
69-53670

ISENHART, DEBORAH L  
69-53827

PAKOOTAS, JODI M  
69-53671

PERRON, ERIC  
69-53707

RUIZ, DESTINY L  
69-53705

WHITE, JESSICA M  
69-53669

**COWLITZ INDIAN TRIBE**

ANDERSON CAREY, DEJUVANTE L  
69-53808

AUN, MENG H  
69-53831

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

**NEW APPLICATIONS**

**CLASS III GAMING EMPLOYEE**

**COWLITZ INDIAN TRIBE**

BECERRA, NEVAEH M  
69-53747

BELL, PAMELA L  
69-53800

BLADES, JENNIFER M  
69-53699

BRADY, SUSAN A  
69-53698

CAMPOS TORRES, SALVADOR  
69-53878

CLIFFORD, ANTHONY E  
69-53597

CONJUGACION, ASHLEY E  
69-53814

CONNER, SEAN M  
69-53832

DAHL, MICHELLE P  
69-53874

GARDINER, SYDNEY A  
69-53615

GRIGGS, CHRISTOPHER L  
69-53702

HAMMERS, JESSE R  
69-53837

HOFSCHEIDER, MARGARITA D  
69-53873

HORNER, KASSIDY N  
69-49494

JENNINGS, TYLER L  
69-53810

LAPUZ, MARCUS JIEMAR V  
69-53639

LOMBARDI BRANNON, LORETTA  
69-53613

MARQUEZ-MAGALLANES, FRANCISCO  
69-53753

MARTIN, RENE D  
69-53815

MCPOLAND, KAYLEE R  
69-53721

MITCHELL, BARBARA L  
69-53816

NEWHOUSE, JOZIAH L  
69-53801

PARMETER, KALEB R  
69-49522

PELTZER, SARA N  
69-53700

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

**NEW APPLICATIONS**

**CLASS III GAMING EMPLOYEE**

**COWLITZ INDIAN TRIBE**

PEONIO, ISABEL M  
69-53725

RESOFF, SASHA L  
69-53638

RONGROVEN-THOMPSON, AUBRIELLA J  
69-53596

SANCHEZ, DYLAN W  
69-53723

SCHIRMER, CLAYTON E  
69-53809

SCOTT, ASHLEY N  
69-53813

SMITH, CHRISTY M  
69-53701

STEVENSON, DYLAN R  
69-53836

THOMAS, RICHARD J  
69-53614

WELLER, CHRISTOPHER D  
69-53922

WILLIAMS, CARLI J  
69-53697

WOODSON, JORDAN C  
69-53826

ZUNIGA, JOHN R  
69-53720

**KALISPEL TRIBE**

ALABDURAZZAQ, ABDUALMJEED S  
69-53641

ALLEN, MICHELE A  
69-53876

ANGLIN, EASTON L  
69-47596

BUSTAMANTE, JOSEPH T  
69-53780

COX, CHERILYN K  
69-53746

DANIELS, DAVID P JR  
69-53640

DONELAN, DANIELLE R  
69-53875

GROVE, CHRISTOPHER T  
69-53686

HALL, BRENDA K  
69-53710

JOHNLEY, JEANETTE K  
69-35432

PERSON'S NAME

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**NEW APPLICATIONS**

**CLASS III GAMING EMPLOYEE**

**KALISPEL TRIBE**

KAUFMAN, JOANNA M  
69-53804

LAVERDURE-MUDRYK, MARANDA S  
69-53779

MATSON, DAVID L  
69-53877

SAUNDERS, JEFFREY S JR  
69-53761

**LUMMI NATION**

CADY, IZAAIAH H  
69-53734

HOSKINS, DEION A  
69-53811

JOHNSON, HIEDIE L  
69-53684

LINVILLE, SEAN A  
69-53812

PHILLIPS, CASSANDRA J  
69-53682

TOBY, DEZIRAE L  
69-53683

WELCH, TIMOTHY M  
69-53735

**MUCKLESHOOT INDIAN TRIBE**

BENJAMIN, HEATHER D  
69-53657

CAMPBELL, NIA M  
69-53696

CHHANG, ROTTHAR R  
69-26244

COOK, KAITLYN N  
69-53820

DELOS REYES, MICHAEL P  
69-53772

GEMIN, MICHAEL P  
69-53821

GERKEY, RYAN C  
69-53586

GONZALEZ DE LA CRUZ, ESTEBAN  
69-53771

GRIMM, MARY L  
69-53656

HARANG, DANIELLE  
69-53694

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

**NEW APPLICATIONS**

**CLASS III GAMING EMPLOYEE**

**MUCKLESHOOT INDIAN TRIBE**

JACKSON, BENNETT H  
69-19029

JUNGWIRTH, JARED M  
69-53822

KING, MARIA VICTORIA D  
69-53797

KNECHT, JOSEPH A  
69-53770

KOSKE, JULIE A  
69-53769

LOPEZ, JOCELYN  
69-53655

MILES, LISA L  
69-05188

MOODY, STYLES J  
69-53798

NHOEUN, DARICK M  
69-53587

NISSON, KAIA S  
69-53742

PARVUS, MARIE A  
69-53743

PETTERSSON-FERET, MEGHAN L  
69-53588

POTUCEK, KELAN I  
69-53840

RAMIREZ, ROGELIO R  
69-53654

SMITH, LYNN R  
69-53841

STEPHENS, RONALD W JR  
69-53842

STEPHENSON, SABIAN K  
69-53695

SWEENEY, MICHAEL C  
69-53819

TRUONG, KHANH-LINH T  
69-28777

WEABLE, CHRISTIAN A  
69-53799

**NISQUALLY INDIAN TRIBE**

ATWOOD, JALEN H  
69-53755

BANKS, MANDI J  
69-53749

BASSETT, CARLOS S  
69-53662

BOYER, CODY C  
69-41611

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

**NEW APPLICATIONS**

**CLASS III GAMING EMPLOYEE**

**NISQUALLY INDIAN TRIBE**

BRASSARD, MARTISSA M  
69-53867

BULLPLUME, MAURINDA M  
69-43913

COOK, ROXANNE C  
69-43858

DEVRIES, SKYLER B  
69-53794

GASCHE, CAMERON D  
69-53726

HETRICK, SARAH A  
69-53866

HICKS, KATANA L  
69-53834

HOOVER, ROBERT L  
69-53760

LUONG, HA M  
69-53737

MATUNAN, SEVERINO A  
69-53563

MCCLOUD, WILLETTE K  
69-44162

PANTOJA, GABRIEL R  
69-53759

RA, TIFFANIE R  
69-53748

ROMANO, HEO  
69-09865

SCOTT, WENDI K  
69-53736

SPAIN, JEANNA K  
69-53675

STRAEDE, DAVID W  
69-53663

WELLS-DAVIS, KYRA M  
69-48622

WITHEROW, JERRY T  
69-53676

**NOOKSACK INDIAN TRIBE**

ARNETT, DONALD R  
69-22498

DEGROOT, MATTHEW C  
69-53583

ILLY, CONNIE  
69-53677

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

**NEW APPLICATIONS**

**CLASS III GAMING EMPLOYEE**

**PORT GAMBLE S'KLALLAM TRIBE**

CARL, JASMINE A  
69-26149

DOLEMAN, TIANI M  
69-53650

GARRISON, CHEYENNE G  
69-53651

HALL, LE'DERRICK P  
69-43428

MCDONAGH, THOMAS M  
69-53714

PADDOCK, CHARLOTTE J  
69-53767

PHILLIPS, BRANDON A  
69-53715

RUEGGE, JUSTIN D  
69-53652

**PUYALLUP TRIBE OF INDIANS**

ADAMS, LORI L  
69-48393

AMOS, TAAVILI I  
69-53901

BAKER, AUSTIN D  
69-53693

BARRIENTOS, ZACHARY J  
69-53928

BONDS, DREW J  
69-53881

BUKOVAC, KENDRA M  
69-53919

BURNETT, ALICIA Q  
69-53817

BYNUM, RICKEY A III  
69-53664

CLARK, MYRA A  
69-45949

COUTURE, JAMES B  
69-53902

DANIELS, ALEXANDER R  
69-53758

DELA ROSA, JOEPET R  
69-53692

DIZON, MARIA I  
69-53740

DUNCOMBE, JEREMIAH E  
69-53791

GARCIA, JOSHUA G  
69-53741

GARRETT, JANETTE Y  
69-53830

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

**NEW APPLICATIONS**

**CLASS III GAMING EMPLOYEE**

**PUYALLUP TRIBE OF INDIANS**

GILKEY, ALONZO L  
69-53792

HANIPALE, KENNEDY J  
69-53717

HIGGINS, HUNTER J  
69-53844

JOHNSON, JESSIE L  
69-53718

KAUTZ, LALONDA T  
69-15708

LARANCE, CHARLES B  
69-53929

LAZZAR, MISTY R  
69-10997

LEONARD, JASON D  
69-47941

LORD, OLIVER R  
69-53918

MALEPEAI, SEAN S  
69-53789

MASON-JOHNSON, PRINCETON K  
69-53773

OMAR, LODRIGO J JR  
69-53930

OWENS, DARREN R  
69-53917

PAPATU, SAUFOI J JR  
69-53757

POPE-MCGUIRE, MELISSA J  
69-53744

REPASS, EMILY R  
69-53824

RITTIERODT, RIVER P  
69-53888

SEM, SOVANNY S  
69-36805

SIAKI, MALOFOU P  
69-53889

SIMONTON, TOMMY  
69-53887

TAOIPU, PERRY M  
69-53774

TUIASOSOPO, MICHAEL P  
69-53931

VILLEGAS, ANGEL R  
69-53704

VONG, NARIN  
69-53790



PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

**NEW APPLICATIONS**

**CLASS III GAMING EMPLOYEE**

**PUYALLUP TRIBE OF INDIANS**

VOSS, PAUL M  
69-35808

WATKINS, JANELLE M  
69-53751

WILLIAMS, SAM M  
69-15161

**QUINAULT NATION**

BOATSMAN, TIMOTHY A  
69-34958

BOUGHER, THOMAS R JR  
69-53645

BRADEN, KASSANDRA M  
69-53604

FRANCIS, MARY K  
69-02482

GIBBS, DUSTIN J  
69-39244

GRAYSON, JOSEPH C III  
69-53646

JARAMILLO, BRIDGET A  
69-53765

JONES, JEREMIAH A  
69-07064

MORGAN, JESSICA L  
69-53605

MORROW, BRYAN L  
69-20660

PITCH, CHRISTIAN V  
69-53644

RICKEL, MITCHELL L  
69-53835

SPARKS, JACQUELIN A  
69-53560

WHITE, ROBERT A  
69-53713

YEAGER, JASON C  
69-53712

**SHOALWATER BAY TRIBE**

DASHER, JESSE A  
69-53709

SANDERS, STACEY J  
69-53708

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

**NEW APPLICATIONS**

**CLASS III GAMING EMPLOYEE**

**SKOKOMISH TRIBE**

BLAIR, CHRISTOPHER A  
69-53679

COLEMAN, MISTIE D  
69-53727

MOHR, DIANE L  
69-53678

**SNOQUALMIE TRIBE**

BELL, RICHARD D  
69-53782

BODIONGAN, ANNE MARGARET A  
69-53672

CAVES, CHRISTIAN J  
69-53673

ENSLEY, TERRI M  
69-53795

GAI, XIAOLI  
69-53733

KALLBERG, JADEN B  
69-53828

KHENG, MELISSA C  
69-53729

LAFONTAINE, JARED T  
69-48594

LUONG, TUYEN M  
69-53629

MEREEN, STEVE G  
69-53628

MONROE, BRETT M  
69-53843

NGUYEN, LOAN T  
69-48697

PHAKOXAY, MANIVANH M  
69-53728

PUNTER, MARTIN J  
69-53781

SHARPE, RYAN LEE B  
69-53732

TIETJENS, RICHARD A  
69-53731

TRUONG, KHANH-LINH T  
69-28777

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

**NEW APPLICATIONS**

**CLASS III GAMING EMPLOYEE**

**SPOKANE TRIBE**

BOWYER, RONALD A  
69-53647

BULLPLUME, LEVI F  
69-53738

BUTTE, MATTHEW T  
69-53716

FINLEY, THOMAS J  
69-53591

FLETT, JEFFREY M  
69-44816

LOVE, JONATHAN T  
69-53648

OLSON, JEFFREY L  
69-53703

OUALLS, PERRIN A  
69-53690

VILLANUEVA, SKYLAR D  
69-51956

VINSON, RORY A  
69-53606

WILLIAMS, ASHLEY R  
69-53584

**SQUAXIN ISLAND TRIBE**

ADAMS COOK, AMBER E  
69-53558

BECKER, MAXWELL A  
69-53635

BOELK, KYLA J  
69-53750

HAZELTON, TIMOTHY D  
69-53637

HYLTON, JESSICA M  
69-20942

LAWIN, JOSHUA T  
69-22934

MARTIN, MISCHA A  
69-53556

O'GRADY, CARISSA D  
69-53642

OLIVER, SEAN L  
69-39155

RAMPA, AUGUSTO  
69-40275

REEVES, MAXWELL R  
69-53626

ROCKWELL, JASON S  
69-32550

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

**NEW APPLICATIONS**

**CLASS III GAMING EMPLOYEE**

**SQUAXIN ISLAND TRIBE**

ROEBLING, KAYLA L  
69-53829

SARTAIN, DONALD J  
69-43138

SHEETZ, SARA W  
69-53776

SPINNEY, ERIK C  
69-40812

**SUQUAMISH TRIBE**

CORNELIUS, MICHAEL P  
69-53899

FISHER, NICHOLAS T  
69-53905

FRITZ, ZOE A  
69-53775

HOYT, KRYSTEN M  
69-53691

KUSAGAYA, JUNE E  
69-53900

MCDONALD WALLACE, KELLI LEE V  
69-53665

RAPP, DAVID L  
69-53719

RUCKER, TINA K  
69-53666

SHAKERI, CAMERON A  
69-53739

VOORHEES, BRENT L  
69-35560

**SWINOMISH INDIAN TRIBAL COMMUNITY**

NGUYEN, CHAULUAN S  
69-53667

REVEY, MARY J  
69-53904

ROEHR, JEANETTE P  
69-53872

SANCHEZ-ROBLERO, HEIDY  
69-53768

SHOE, KELLEN P  
69-53903

**THE TULALIP TRIBES**

ANDERSON, DAVID P  
69-53860

BELVIZ, SETH U  
69-53845

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

**NEW APPLICATIONS**

**CLASS III GAMING EMPLOYEE**

THE TULALIP TRIBES

BODYFELT, KAEDEN M  
69-53474

BRIGHT, KAYLA M  
69-53783

CLEARY, SAMANTHA R  
69-53850

DEGIORGI, PAUL A  
69-53846

DOCUYANAN, JOSHUA D  
69-53853

DUHRKOOP, EMILY A  
69-53784

ESTRADA, JOSE A  
69-53854

GONZALEZ, AIYANA J  
69-53777

HENSLEIGH, HEATH P  
69-53857

HERNANDEZ, JAIME V  
69-53754

HERNANDEZ, JOE I JR  
69-40719

HOPE, LINDSIE M  
69-53805

HU, DONNA  
69-53892

JAMES, COREY A  
69-53778

KWOK, DANEIL Y  
69-53851

LANZON, ANTHONY B  
69-53724

LARMAY, MARY J  
69-53849

LIM, FRADDIE F  
69-53894

LINSON, JEANETTE M  
69-36341

MARTIN, CHANTEL E  
69-53681

MEAFUA, ISIAH  
69-53855

NGUYEN, HIEN H  
69-53861

NGUYEN, LY T  
69-53862

NGUYEN, MARC T  
69-53848

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

**NEW APPLICATIONS**

**CLASS III GAMING EMPLOYEE**

THE TULALIP TRIBES

NOCON, LORELEI J  
69-53859

PALMER, RODNEY K  
69-53803

PERRY, KALEY L  
69-40290

PHILLIPS, JUSTEN R  
69-53802

RAMOS, ROBERT J  
69-53847

REICHEL, ANTHONY E  
69-31693

REYES, MITCHELL D  
69-53788

RIEDEL, MAX U  
69-53856

SCOLL, EDWARD L  
69-53893

VILLANUEVA RODRIGUEZ, ARMANDO  
69-53825

WHARTON, VANNESSA U  
69-53858

WU, SHAUN J  
69-53863

WU, TINGTING  
69-42814

YBARRA, ADRIAN E JR  
69-53722

UPPER SKAGIT INDIAN TRIBE

BISCONDE, JIMMY B  
69-15518

CAYOU, KENNETH C  
69-53793

DE ROSE, MARCELLINO V  
69-30006

GRAFFIUS, TAMIKO A  
69-53756

JOHNSEN, COLTON E  
69-53689

KELLEY, AUSTIN D  
69-50831

ODEGAARD, RENEE M  
69-53688

SHARP, AIDAN J  
69-53885

STONE, TRENT J  
69-53807

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

**NEW APPLICATIONS**

**CLASS III GAMING EMPLOYEE**

YAKAMA NATION

ABRAHAM, YOLANDA J  
69-53921

BLEVINS, ERICA D  
69-35587

CREE, ROBIN R  
69-08847

ENCINAS, BRENDA M  
69-53920

JACK, DARIAN J  
69-48044



**Washington State Gambling Commission  
Pre-Licensing Report  
Manufacturing License**

**Part I  
Licensing/Organization Information**

<b>Type of Approval</b> Manufacturer License	<b>Premises/Trade Name/Address</b> CountR GmbH Fahrenheitstr 6 Kleinmachnow, Germany 14532
<b>Date of Application</b> February 25, 2021	

**APPLICANT INFORMATION**

<b>Name</b> CountR GmbH	<b>License Application #</b> 20-00218	<b>Business Phone #</b> 49-332038799910
<b>Address</b> CountR GmbH Fahrenheitstr 6 Kleinmachnow, Germany 14532		

**ACTIVE LICENSES ISSUED BY GAMBLING COMMISSION**

<b>Description/Class</b> Manufacturers License	<b>Exp. Date</b> 09/30/2023	<b>License Number(s)</b> 20-00218
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**COMMISSION STAFF**

<b>Licensing Specialist</b> Michelle Davis	<b>Special Agents</b> Kevin Maxwell Julie Sullivan
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**Background/Structure**

**General Information:**

CountR GmbH applied for a manufacturer license. They are a privately held Corporation headquartered in Kleinmachnow, Germany.

CountR GmbH plans to provide Cash in/Cash out kiosks to Tribal Casinos in Washington. They are also hoping to get approval to provide a ticket in/ticket out system (Table Games Accounting System) for use on gaming tables.

**Organizational/Ownership Structure:**

**CountR GmbH**

Title	Name	Ownership
CEO/Manager	Rainer Seyer	0%
CFO	Dominik Winau	30%
Shareholder	Big 5 4 Life GmbH	70%
Total		100%



**Big 5 4 Life GmbH**

Title	Name	Ownership
CEO, Owner	Rainer Seyer	100%

**Other Jurisdictions Licensed:**

CountR GmbH is licensed in several jurisdictions, including Minnesota, Pennsylvania, Michigan, Nevada, and South Dakota.

**Part II  
Licensing Investigations Summary**

Special Agents from the Commission's Regulation and Licensing Units conducted a criminal history and financial investigation focusing on funding sources and beneficiaries for suitability in accordance with RCW 9.46 and WAC 230. The investigation included verifying the ownership structure and reviewing financial and business records as well as reviewing the manufacturing process. The investigation found:

- No unreported people or businesses involved (i.e. substantial interest holders);
- No undisclosed ownership or undisclosed involvement in other activities/businesses;
- No disqualifying administrative history;
- All funding sources were disclosed; and
- All substantial interest holders qualify to hold a license.

**Source of Funds:**

CountR GmbH is an existing business and their source of funds for their application came from cash on hand from operations.

**Part III  
Staff Recommendations**

Based upon the criminal history and financial background investigations, staff recommends licensing CountR GmbH with a manufacturer license.

**Prepared By**

Jennifer LaMont, Agent in Charge  
Licensing Unit

**Signature****Date**

November 10, 2022



**Washington State Gambling Commission  
Pre-Licensing Report  
Manufacturer**

**Part I  
Licensing/Organization Information**

<b>Type of Approval</b> Manufacturer License	<b>Premises/Trade Name/Address</b> Interblock Luxury Gaming Products Gorenjska cesta 23 1234 Mengeš Slovenia - EU
<b>Date of Application</b> September 21, 2021	

**APPLICANT INFORMATION**

<b>Name</b> Interblock d.o.o.	<b>License Application #</b> 20-00270	<b>Business Phone #</b> (702) 260-1384
<b>Address</b> Gorenjska cesta 23 1234 Mengeš Slovenia - EU		

**ACTIVE LICENSES ISSUED BY GAMBLING COMMISSION**

<b>Description/Class</b> Manufacturer License	<b>Exp. Date</b> 09/30/2023	<b>License Number(s)</b> 20-00270
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**COMMISSION STAFF**

<b>Licensing Specialist</b> Jeanette Warner	<b>Special Agents</b> Donna Khanhasa Nathan Kresse
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**Background/Structure**

**General Information:**

Interblock d.o.o., doing business as Interblock Luxury Gaming Products, is a wholly owned subsidiary of IB OCM Voteco, applied for a manufacturer license to provide electronic table games.

**Organizational/Ownership Structure:**

**Interblock d.o.o. (formerly known as Interblock d.d.)**

Title	Name	Spouse	% Ownership
CEO, Director	John Connelly IV	Natalie Connelly	0%
Director	Matthew Wilson	Sharla Wilson	0%
Director	Jordon Kruse	Jacqueline Kruse	0%
Director	David Quick	Tiffany Quick	0%
Shareholder	IB OCM Voteco	N/A	100% voting equity and control

Financier	OCM Luxembourg Baccarat Bidco S.a.r.l.	N/A	100% passive non-voting equity
	<b>Total</b>		100%

**IB OCM Voteco:**

Title	Name	Spouse	% Ownership
President, Director	Matthew Wilson	Sharla Wilson	33.33%
Treasurer, Director	Jordon Kruse	Jacqueline Kruse	33.33%
Secretary, Director	David Quick	Tiffany Quick	33.33%
	<b>Total</b>		100%

**OCM Luxembourg Baccarat Bidco S.a.r.l.:**

Title	Name	Spouse	% Ownership
Manager	David Quick	Tiffany Quick	0%
Shareholder	OCM Luxembourg Baccarat Midco S.a.r.l.	N/A	100%
	<b>Total</b>		100%

**OCM Luxembourg Baccarat Midco S.a.r.l.:**

Title	Name	Spouse	% Ownership
Manager	David Quick	Tiffany Quick	0%
Shareholder	OCM Luxembourg Baccarat Holdco S.a.r.l.	N/A	100%
	<b>Total</b>		100%

**OCM Luxembourg Baccarat Holdco S.a.r.l.:**

Title	Name	Spouse	% Ownership
Manager	David Quick	Tiffany Quick	0%
Shareholder	OCM Luxembourg SSF II S.a.r.l.	N/A	100%
	<b>Total</b>		100%

**OCM Luxembourg SSF II S.a.r.l.:**

Title	Name	Spouse	% Ownership
Manager	David Quick	Tiffany Quick	0%
Shareholder	OCM SSF II IB Holdings, LP	N/A	100%
	<b>Total</b>		100%

**OCM SSF II IB Holdings, LP:**

Title	Name	Spouse	% Ownership
Manager	David Quick	Tiffany Quick	0%
General Partner	Oaktree Fund GP 1A. Ltd.	N/A	No economic interest
Institutional Investor	Oaktree Special Situations Fund II (Cayman) Holdings, LP	N/A	100% LP interest
	<b>Total</b>		100%

**Affiliated Companies:**

Interblock Luxury Gaming Products' wholly-owned subsidiary, Interblock USA LC, doing business as Interblock USA LLC, applied for and was issued a distributor license (21-00316), which expires on 6/30/2023.

**Other Jurisdictions Licensed:**

Interblock Luxury Gaming Products is licensed in multiple other jurisdictions in the U.S, including Louisiana, Michigan, Mississippi, Nevada, New Jersey, Ohio, Oklahoma, Oregon, Puerto Rico, and West Virginia.

**Part II  
Licensing Investigations Summary**

Special Agents from the Commission's Licensing Unit conducted a criminal history and financial investigation focusing on funding sources and beneficiaries for suitability in accordance with RCW 9.46 and WAC 230. Staff went on-site to Menges, Slovenia, to conduct their investigation, which included verifying the ownership structure, reviewing financial and business records, and observing the manufacturing process for the electronic table games. The investigation found:


- No unreported people or businesses involved (i.e. substantial interest holders).
- No undisclosed ownership or undisclosed involvement in other activities/businesses.
- No disqualifying administrative history.
- All funding sources were disclosed; and
- All substantial interest holders qualify to hold a license.

**Source of Funds:**

The company's source of funds for bringing their business to Washington State came from cash on hand from operations, including investments from their new parent organization, Oaktree Special Situations Fund.

**Part III  
Staff Recommendations**

Based upon the criminal history and financial background investigations, staff recommends issuing Interblock Luxury Gaming Products with a manufacturer license as applied for.

<b>Prepared By</b> Jennifer LaMont, Agent in Charge Licensing Unit	<b>Signature</b> 	<b>Date</b> December 12, 2022
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**Washington State Gambling Commission  
Pre-Licensing Report  
Major Sports Wagering Vendor**

**Part I  
Licensing/Organization Information**

<b>Type of Approval</b> Major Sports Wagering Vendor License	<b>Trade Name/ Premises Address</b> Penn Sports Interactive, LLC 1818 Market Street 13 <sup>th</sup> Floor Philadelphia, PA 19103
<b>Date of Application</b> March 12, 2022	

**APPLICANT INFORMATION**

<b>Name</b> Penn Sports Interactive, LLC	<b>License Application #</b> 10-00230	<b>Business Phone #</b> (610) 507-1751
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**Mailing Address**  
1818 Market Street 13<sup>th</sup> Floor  
Philadelphia, PA 19103

**ACTIVE LICENSES ISSUED BY GAMBLING COMMISSION**

<b>Description/Class</b> Major Sports Wagering Vendor License	<b>Exp. Date</b> 09/30/2023	<b>License Number(s)</b> 81-00013
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**COMMISSION STAFF**

<b>Licensing Specialist</b> Michelle Davis	<b>Special Agents</b> Donna Khanhasa Kevin Maxwell
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**PENN**  
**INTERACTIVE**

**Background/Structure**

**General Information:**

Penn Sports Interactive, LLC (PSI) was formed in the state of Delaware in December 2018. They are a wholly-owned subsidiary of Penn Interactive Ventures, LLC, which is a wholly-owned subsidiary of PENN Entertainment, Inc. (formerly known as Penn National Gaming, Inc., a publicly traded company.

PSI has applied for a Major Sports Wagering Vendor license to provide the following services in Washington:

- Managing a Tribe's or Tribes' sports wagering operations
- Being a Tribe's primary consultant who provides substantial sports wagering related services
- A manufacturer or distributor of a sports wagering system(s)
- Providing bookmaking services
- Providing sports wagering risk management services

**Organizational/Ownership Structure:**

**Penn Sports Interactive, LLC**

Title	Name	Ownership
President	Jay Snowden	0%
Treasurer	Felicia Hendrix	0%
Secretary	Harper Ko	0%
Member	Penn Interactive Ventures, LLC	100%

**Penn Interactive Ventures, LLC**

Title	Name	Ownership
President	Jay Snowden	0%
Vice President	Benjamin Levy	0%
Treasurer	Felicia Hendrix	0%
Secretary	Harper Ko	0%
Owner	PENN National Gaming, Inc.	100%

**PENN Entertainment, Inc.\* (formerly known as Penn National Gaming, Inc.)(as of June 30, 2022)**

Title	Name	Ownership
President, CEO, Director	Jay Snowden	1.24%
EVP, Operations	Todd George	0.07%
EVP, CFO	Felicia Hendrix	0.01%
EVP, Chief Strategy Officer	Christopher Rogers	0.04%
EVP, Chief Legal Officer, Secretary	Harper Ko	0.0%
Director	Vilma Black-Gupta	0.01%
Chairman Emeritus	Peter Carlino	1.07%
Chairman	David Handler	0.11%
Director	John Jacquemin	0.06%
Director	Marla Kaplowitz	0.01%
Director	Barbara Shattuck-Kohn	0.03%
Director	Ronald Naples (Rec. 6/9/22)	0.01%
Director	Saul Reibstein (Rec. 6/9/22)	0.05%
Director	Jane Scaccetti (Rec. 6/9/22)	0.03%
Inst. Investor	FMR, LLC	12.62%
Inst. Investor	BlackRock, Inc.	9.35%
Inst. Investor	Vanguard Group, Inc.	11.11%
Inst. Investor	BAMCO, Inc.	6.65%
Inst. Investor	Invesco, Ltd.	7.37%
Shareholders	Other Shareholders below 5%	~50.1%

<b>Total</b>		<b>100%</b>
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\* On August 4, 2022, Penn National Gaming, Inc. changed its name to PENN Entertainment, Inc. The company is publicly traded on NASDAQ under the symbol "PENN."

**Other Jurisdictions Licensed:**

PSI is licensed in several jurisdictions, including Colorado, Louisiana, Maryland, Tennessee, and Michigan.

<b>Part II</b> <b>Licensing Investigations Summary</b>
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Special Agents from the Commission's Licensing and Regulation Units conducted a criminal history and financial investigation focusing on funding sources and beneficiaries for suitability in accordance with RCW 9.46 and WAC 230. The investigation included verifying the ownership structure, reviewing financial and business records. The investigation found:

- No unreported people or businesses involved (i.e., substantial interest holders),
- No undisclosed ownership or undisclosed involvement in other activities/businesses,
- No disqualifying administrative history,
- All funding sources were disclosed, and
- All substantial interest holders qualify to hold a license.

**Source of Funds:**

The costs associated with starting sports wagering services in Washington came from cash on hand from operations.

<b>Part III</b> <b>Staff Recommendations</b>
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Based upon the criminal history and financial background investigations, staff recommends licensing Penn Sports Interactive, LLC, with a Major Sports Wagering Vendor license.

<b>Prepared By</b> Jennifer LaMont, Agent in Charge Licensing Unit	<b>Signature</b> 	<b>Date</b> December 28, 2022
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**Washington State Gambling Commission  
Pre-Licensing Report  
Mid-Level Sports Wagering Vendor**

**Part I  
Licensing/Organization Information**

<b>Type of Approval</b> Mid-Level Sports Wagering Vendor License	<b>Trade Name/ Premises Address</b> IMG Arena US, LLC 11 Madison Ave, 17 <sup>th</sup> Floor New York, NY 10010
<b>Date of Application</b> 9/14/2022	

**APPLICANT INFORMATION**

<b>Name</b> IMG Arena US, LLC	<b>License Application #</b> 10-00341	<b>Business Phone #</b> (609) 916-5749
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**Mailing Address**  
11 Madison Ave, 17<sup>th</sup> Floor  
New York, NY 10010

**ACTIVE LICENSES ISSUED BY GAMBLING COMMISSION**

<b>Description/Class</b> Mid-Level Sports Wagering Vendor License	<b>Exp. Date</b> 09/30/2023	<b>License Number(s)</b> 82-00027
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**COMMISSION STAFF**

<b>Licensing Specialist</b> Monnette Rancour	<b>Special Agents</b> Donna Khanhasa Nathan Kresse
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**Background/Structure**

**General Information:**

IMG Arena US, LLC (“IMG Arena”) was formed in the State of Delaware in January 2019.

IMG Arena has applied for a Mid-Level Sports Wagering Vendor License to provide data to be used by a Tribe or sports wagering vendor, including data to set odds, and services related to the compilation, furnishing or storage of data for use in sports wagering.

**Organizational/Ownership Structure:**



### IMG Arena US, LLC

Position	Name	Ownership
LLC Manager	IMG Arena US Parent, LLC	100%
Senior Sales Director	Brian Clayton	-
Managing Director and Executive Vice President	Desmond (Freddie) Longe	-

### IMG Arena US Parent, LLC

Position	Name	Ownership
LLC Manager	WME IMG, LLC	100%
Senior Sales Director	Brian Clayton	-
Managing Director and Executive Vice President	Desmond (Freddie) Longe	-

### WME IMG, LLC

Title	Name	Ownership
LLC Manager	WME IMG Holdings, LLC*	100%
CEO, Director	Ariel Emanuel	0%
Executive Chairman, Director	Patrick Whitesell	0%
President	Mark Shapiro	0%
CFO	Jason Lublin	0%
Chief Legal Officer	Seth Krauss	0%

\* WME IMG, LLC is an indirect subsidiary of Endeavor Group Holding, Inc. (Endeavor), which was investigated as a substantial interest holder as part of the licensing investigation of NYX Digital Gaming (USA), LLC. Endeavor's Class A Common shares are publicly listed on NYSE under ticker symbol "EDR."

#### Affiliated Company:

IMG Arena US, LLC's sister company, NYX Digital Gaming (USA), LLC currently holds Major, Mid-Level and Ancillary Sports Wagering Vendor licenses.

#### Other Jurisdictions Licensed:

IMG Arena is licensed in several jurisdictions, including Colorado, New Jersey, Pennsylvania, Indiana, West Virginia, Tennessee, Virginia, Illinois, United Kingdom, and British Columbia, among many others.

## Part II Licensing Investigations Summary

Special Agents from the Commission's Licensing Unit conducted a criminal history and financial investigation focusing on funding sources and beneficiaries for suitability in accordance with RCW 9.46 and WAC 230. The investigation included verifying the ownership structure, reviewing financial and business records. The investigation found:

- No unreported people or businesses involved (i.e., substantial interest holders),
- No undisclosed ownership or undisclosed involvement in other activities/businesses,
- No disqualifying administrative history,
- All funding sources were disclosed, and
- All substantial interest holders qualify to hold a license.


**Source of Funds:**

The costs associated with starting sports wagering services in Washington came from cash on hand from the parent company, Endeavor.

**Part III  
Staff Recommendations**

Based upon the criminal history and financial background investigations, staff recommends licensing IMG Arena US, LLC with a Mid-Level Sports Wagering Vendor license.

**Prepared By**  
Jennifer LaMont, Agent in Charge  
Licensing Unit

**Signature**  


**Date**  
December 13, 2022



**Washington State Gambling Commission  
Pre-Licensing Report  
Mid-Level Sports Wagering Vendor**

**Part I  
Licensing/Organization Information**

<b>Type of Approval</b> Mid-Level Sports Wagering Vendor License	<b>Trade Name/ Premises Address</b> NeoGames Solutions, LLC 10 Habarzel Street Tel Aviv, Israel 6971014
<b>Date of Application</b> May 27, 2022	

**APPLICANT INFORMATION**

<b>Name</b> NeoGames Solutions, LLC	<b>License Application #</b> 10-00305	<b>Business Phone #</b> +972 73372 3107
<b>Mailing Address</b> 10 Habarzel Street Tel Aviv, Israel 6971014		

**ACTIVE LICENSES ISSUED BY GAMBLING COMMISSION**

<b>Description/Class</b> Mid-Level Sports Wagering Vendor License	<b>Exp. Date</b> 09/30/2023	<b>License Number(s)</b> 82-00024
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**COMMISSION STAFF**

<b>Licensing Specialist</b> Elizabeth O'Hara	<b>Special Agents</b> Julie Sullivan
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**Background/Structure**

**General Information:**

NeoGames Solutions, LLC applied for a Mid-Level Sports Wagering Vendor licensee to provide sports wagering account management, including Software-as-a-Service (SaaS) for sports wagering, through their Player Account Management (PAM) system known as NeoSphere.

**Organizational/Ownership Structure:** There are no Officers or Directors at the NeoGames Solutions level or at the Neogames US LLP level. The Officers act on a group level from the ultimate parent, NeoGames S.A.

Title	Name	% Ownership
Member	NeoGames US LLP	100%
	Total	100%

#### Neogames US LLP

Title	Name	% Ownership
Member	NeoGames S.A.	99%
Member	NeoGames Systems Ltd.	1%
	Total	100%

#### NeoGames S.A.\*

Title	Name	% Ownership
CEO, Director	Mordechay (Moti) Malool	0%
CFO	Raviv Alder	0%
COO	Rinat Belfer	0%
CTO	Oded Gottfried	1.27%
President	Isaac Maimon	0%
Chairman	John Taylor Jr.	0%
Non-Executive Director	Laurent Teitgen	0%
Non-Executive Director	Lisbeth Rainey McNabb	0%
Stockholder, Non- Executive Director	Barak Matalon	23.8%
Stockholder	Elyahu Azur	14.8%
Stockholder	Pinhas Zahavi	14.9%
Stockholder, Non- Executive Director	Aharon (Rony) Aran	5.9%
Stockholder	Individually <5% of total shares	39.33%
	Total	100%

\* Publicly traded on NASDAQ under NGMS. Ownership as of July 10, 2022.

A sister company of the applicant, NeoGames Systems, Ltd. holds the intellectual property and is 1% owner of the applicant. Like our applicant, NeoGames Solutions, LLC, there are no officers or directors at the NeoGames Systems Limited level. The officers act on a group level from NeoGames S.A.

#### Neogames Systems, Ltd.

Title	Name	% Ownership
Member	NeoGames S.A.	100%
	TOTAL	100%

**Other Jurisdictions Licensed:**

NeoGames Solutions, LLC is licensed in multiple jurisdictions including Pennsylvania, Michigan, and Arizona.

**Part II  
Licensing Investigations Summary**

A Special Agent from the Commission's Licensing Unit conducted a criminal history and financial investigation focusing on funding sources and beneficiaries for suitability in accordance with RCW 9.46 and WAC 230. The investigation included verifying the ownership structure, reviewing financial and business records. The investigation found:


- No unreported people or businesses involved (i.e., substantial interest holders).
- No undisclosed ownership or undisclosed involvement in other activities/businesses.
- No disqualifying administrative history.
- All funding sources were disclosed; and
- All substantial interest holders qualify to hold a license.

**Source of Funds:**

The company's source of funds for the licensing process came from cash on hand from operations.

**Part III  
Staff Recommendations**

Based upon the criminal history and financial background investigations, staff recommends licensing NeoGames Solutions, LLC, with a Mid-Level Sports Wagering Vendor license.

<b>Prepared By</b> Jennifer LaMont, Agent in Charge Licensing Unit	<b>Signature</b> 	<b>Date</b> December 28, 2022
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**Washington State Gambling Commission  
Pre-Licensing Report  
Ancillary Sports Wagering Vendor**

**Part I  
Licensing/Organization Information**

<b>Type of Approval</b> Ancillary Sports Wagering Vendor License	<b>Premises/Trade Name/Address</b> Novomatic Americas Sales, LLC 1050 E. Business Center Drive Mount Prospect, IL 60056
<b>Date of Application</b> May 5, 2022	

**APPLICANT INFORMATION**

<b>Name</b> Novomatic Americas Sales, LLC	<b>License Application #</b> 10-00295	<b>Business Phone #</b> (224) 802-2974
<b>Address</b> 1050 E. Business Center Drive Mount Prospect, IL 60056		

**ACTIVE LICENSES ISSUED BY GAMBLING COMMISSION**

<b>Description/Class</b> Ancillary Sports Wagering Vendor License	<b>Exp. Date</b> 09/30/2023	<b>License Number(s)</b> 83-00028
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**COMMISSION STAFF**

<b>Licensing Specialist</b> Michelle Davis	<b>Special Agents</b> Tyson Wilson
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**Background/Structure**

**General Information:**

Novomatic Americas Sales, LLC applied for a new Ancillary Sports Wagering Vendor license because they will be providing sports wagering kiosks without a sports wagering platform to customers in Washington.

Their ultimate parent company, Novomatic AG, was investigated by the Washington State Gambling Commission in 2017 when they purchased a majority interest in Ainsworth Game Technology (20-00254) a manufacturer license holder.

**Organizational/Ownership Structure:****Novomatic Sales America, LLC**

<b>Title</b>	<b>Name</b>	<b>% Ownership</b>
Owner	Novomatic Americas Holdings, Inc.	99%
Owner	Novomatic Americas Investments, Inc.	1%
CEO	Richard Meitzler	
CFO	Leonard Busche	
	<b>Total</b>	100%

**Novomatic Americas Holdings, Inc.**

<b>Title</b>	<b>Name</b>	<b>% Ownership</b>
Owner	Novomatic AG	100%
CEO	Jakob Rothwangl	
Executive VP	Ryszard Presch	
VP	Richard Meitzler	
	<b>Total</b>	100%

**Novomatic AG**

<b>Title</b>	<b>Name</b>	<b>% Ownership</b>
Owner	Novo Invest GmbH	89.96%
Owner	Novo Swiss AG (Gryphon)	10.04%
	<b>Total</b>	100%

**Novo Invest GmbH**

<b>Title</b>	<b>Name</b>	<b>% Ownership</b>
Owner	Johann Graf	80%
Owner	Thomas Graf	10%
Owner	Birgit Wimmer	5%
Owner	Ryszard Presch	5%
	<b>Total</b>	100%

**Novo Swiss AG**

<b>Title</b>	<b>Name</b>	<b>% Ownership</b>
Owner	Johann Graf	100%
	<b>Total</b>	100%

**Other Jurisdictions Licensed:**

Novomatic Americas Sales, LLC is currently licensed several jurisdictions in the U.S. including New Jersey, Colorado, Michigan, Oregon and Pennsylvania.

A Special Agent from the Commission's Licensing Unit conducted a criminal history and financial investigation focusing on funding sources and beneficiaries for suitability in accordance with RCW 9.46 and WAC 230. The investigation included verifying the ownership structure, reviewing financial and business records, and conducting interviews. The investigation found:

- No unreported people or businesses involved (i.e., substantial interest holders).
- No undisclosed ownership or undisclosed involvement in other activities/businesses.
- No disqualifying administrative history.
- All funding sources were disclosed; and
- All substantial interest holders qualify to hold a license.

**Source of Funds:**

The company's source of funds for the licensing process came from cash on hand.

**Part III  
Staff Recommendations**

Based upon the criminal history and financial background investigations, staff recommends licensing Novomatic Americas Sales, LLC with an Ancillary Sports Wagering Vendor license.

**Prepared By**

Jennifer LaMont, Agent in Charge  
Licensing Unit

**Signature**



**Date**

December 2, 2022





**Washington State Gambling Commission  
Pre-Licensing Report  
Ancillary Sports Wagering Vendor**

**Part I  
Licensing/Organization Information**

<b>Type of Approval</b> Ancillary Sports Wagering Vendor License	<b>Premises/Trade Name/Address</b> Worldpay Gaming Solutions 8500 Governor's Hill Drive Cincinnati, OH 45249
<b>Date of Application</b> February 3, 2022	

**APPLICANT INFORMATION**

<b>Name</b> Worldpay Gaming Solutions	<b>License Application #</b> 10-00236	<b>Business Phone #</b> (201)273-2909
<b>Address</b> 8500 Governor's Hill Drive Cincinnati, OH 45249		

**ACTIVE LICENSES ISSUED BY GAMBLING COMMISSION**

<b>Description/Class</b> Ancillary Sports Wagering Vendor License	<b>Exp. Date</b> 09/30/2023	<b>License Number(s)</b> 83-00013
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**COMMISSION STAFF**

<b>Licensing Specialist</b> Rose Guzman	<b>Special Agents</b> Kevin Maxwell
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**Background/Structure**

**General Information:**

Worldpay Gaming Solutions, LLC started out as Vantiv Payment Systems, Inc on May 21, 2012. Vantiv Payment Systems, Inc became Vantiv Gaming Solutions on March 11, 2014, and changed their name again to Worldpay Gaming Solutions, LLC on July 16, 2018 and are incorporated in the state of Delaware. The company applied for an Ancillary Sports Wagering Vendor license to provide mobile payment processing for use in mobile sports wagering in Washington State.

**Organizational/Ownership Structure:**

**Worldpay Gaming Solutions, LLC**

Title	Name	% Ownership
President	Joseph Watkins	0%
Secretary	Tyler Bates	0%
WorldPay, LLC		100%
Total		100%

- Worldpay Gaming Solutions, LLC is ultimately owned by Fidelity National Information Services, Inc which is publicly traded on the New York Stock Exchange and a Fortune 500 Company under ticker FIS.

**Other Jurisdictions Licensed:**

Worldpay Gaming Solutions is licensed in several states to include Arizona, Virginia, Colorado, and West Virginia.

**Part II  
Licensing Investigations Summary**

A Special Agent from the Commission's Regulation Unit conducted a criminal history and financial investigation focusing on funding sources and beneficiaries for suitability in accordance with RCW 9.46 and WAC 230. The investigation included verifying the ownership structure and reviewing financial and business records. The investigation found:

- No unreported people or businesses involved (i.e. substantial interest holders);
- No undisclosed ownership or undisclosed involvement in other activities/businesses;
- No disqualifying administrative history;
- All funding sources were disclosed; and
- All substantial interest holders of Worldpay Gaming Solutions qualify to hold a license.

**Source of Funds:**

The company's source of funds for the pre-licensing process came from cash on hand.

**Part III  
Staff Recommendations**

Based upon the criminal history and financial background investigations, staff recommends licensing Worldpay Gaming Solutions with an Ancillary Sports Wagering Vendor license.

**Prepared By**

Jennifer LaMont, Agent in Charge  
Licensing Unit

**Signature****Date**

December 7, 2022



Washington State Gambling Commission  
Pre-Licensing Report  
Ancillary Sports Wagering Vendor

Part I  
Licensing/Organization Information

<b>Type of Approval</b> Ancillary Sports Wagering Vendor License	<b>Trade Name/ Premises Address</b> YourPay, LLC 2900 Westside Parkway Alpharetta, GA 30004
<b>Date of Application</b> June 28, 2022	

APPLICANT INFORMATION

<b>Name</b> YourPay, LLC	<b>License Application #</b> 10-00320	<b>Business Phone #</b> (470) 751-0981
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**Mailing Address**  
2900 Westside Parkway  
Alpharetta, GA 30004

ACTIVE LICENSES ISSUED BY GAMBLING COMMISSION

<b>Description/Class</b> Ancillary Sports Wagering Vendor License	<b>Exp. Date</b> 09/30/2023	<b>License Number(s)</b> 83-00030
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COMMISSION STAFF

<b>Licensing Specialist</b> Jeanette Warner	<b>Special Agent</b> Donna Khanhasa
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Background/Structure

**General Information:**

YourPay, LLC (YourPay) was formed in the state of Delaware in July 2019.

YourPay has applied for an Ancillary Sports Wagering Vendor license to provide credit card acquiring and disbursement processing as a vendor to financial service providers and/or gaming and sports wagering operators in the online space. This also includes payment processing services which include stored value cards and digital disbursements. YourPlay, LLC will provide card payment services to fund a gaming account and allow a customer to play.

**Organizational/Ownership Structure:**

## YourPay, LLC

Title	Name	% Ownership
LLC Manager, President, Treasurer	George Connors	0%
LLC Manager	Alain Barbet	0%
Member	Melanie Bever	0%
Shareholder	First Data Corporation*	100%
	<b>Total</b>	<b>100%</b>

\* YourPay, LLC, is wholly owned by First Data Corporation, which is wholly owned by Fiserv, Inc., which is publicly traded on NASDAQ under ticker FISV.

Because YourPay operates independently from its parent companies, the only substantial interest holders are the officers and managers of YourPay.

### Affiliated Company:

YourPay's sister company, TeleCheck Services, LLC, currently holds an Ancillary Sports Wagering Vendor license. TeleCheck Services, LLC provides mobile payment processing for use in mobile sports wagering. They provide electronic acceptance and warranty services for ACH transactions to fund sports wagering.

### Other Jurisdictions Licensed:

YourPay is licensed in several jurisdictions, including Arkansas, Arizona, Colorado, Connecticut, Indiana, Michigan, New York, Pennsylvania, Tennessee, and Virginia.

## Part II Licensing Investigations Summary

A Special Agent from the Commission's Licensing Unit conducted a criminal history and financial investigation focusing on funding sources and beneficiaries for suitability in accordance with RCW 9.46 and WAC 230. The investigation included verifying the ownership structure, reviewing financial and business records. The investigation found:


- No unreported people or businesses involved (i.e., substantial interest holders),
- No undisclosed ownership or undisclosed involvement in other activities/businesses,
- No disqualifying administrative history,
- All funding sources were disclosed, and
- All substantial interest holders qualify to hold a license.

### Source of Funds:

The costs associated with starting sports wagering services in Washington came from cash on hand from the parent company.

## Part III Staff Recommendations

Based upon the criminal history and financial background investigations, staff recommends licensing YourPay, LLC, with an Ancillary Sports Wagering Vendor license.

<b>Prepared By</b> Jennifer LaMont, Agent in Charge Licensing Unit	<b>Signature</b> 	<b>Date</b> December 2, 2022
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## HOUSE-BANKED PUBLIC CARD ROOM REPORT

<b>Licensed and Operating</b>			<b>38</b>		
	City	Commission Approval Date	License Expiration Date	Org #	License #
ALL STAR CASINO	SILVERDALE	Jan 14, 1999	Jun 30, 2023	00-18357	67-00058
BLACK PEARL RESTAURANT & CARD ROOM	SPOKANE VALLEY	Jan 10, 2013	Sep 30, 2023	00-22440	67-00321
BUZZ INN STEAKHOUSE/EAST WENATCHEE	EAST WENATCHEE	Oct 10, 2002	Dec 31, 2022	00-11170	67-00183
CARIBBEAN CARDROOM	KIRKLAND	Nov 14, 2019	Sep 30, 2023	00-24515	67-00343
CASINO CARIBBEAN	KIRKLAND	Nov 14, 2019	Sep 30, 2023	00-24512	67-00341
CASINO CARIBBEAN	YAKIMA	Nov 14, 2019	Sep 30, 2023	00-24513	67-00342
CHIPS CASINO/LAKEWOOD	LAKEWOOD	Apr 8, 1999	Dec 31, 2022	00-17414	67-00020
CLEARWATER SALOON & CASINO	EAST WENATCHEE	Feb 14, 2019	Dec 31, 2022	00-24296	67-00339
COYOTE BOB'S CASINO	KENNEWICK	Jul 10, 2009	Mar 31, 2023	00-21848	67-00282
CRAZY MOOSE CASINO II/MOUNTLAKE TERRACE	MOUNTLAKE TERRACE	Jul 10, 2009	Mar 31, 2023	00-21849	67-00283
CRAZY MOOSE CASINO/PASCO	PASCO	Jul 10, 2009	Mar 31, 2023	00-21847	67-00281
FORTUNE CASINO - LACEY	LACEY	Jul 14, 2022	Mar 31, 2023	00-24868	67-00347
FORTUNE CASINO - RENTON	RENTON	Jan 8, 2015	Sep 30, 2023	00-23339	67-00327
FORTUNE CASINO - TUKWILA	TUKWILA	Oct 8, 2015	Jun 30, 2023	00-23465	67-00329
GOLDIES SHORELINE CASINO	SHORELINE	May 13, 1999	Dec 31, 2022	00-17610	67-00016
GREAT AMERICAN CASINO/EVERETT	EVERETT	Nov 12, 1998	Dec 31, 2022	00-19513	67-00194
GREAT AMERICAN CASINO/LAKEWOOD	LAKEWOOD	Aug 14, 2003	Jun 30, 2023	00-19258	67-00184
GREAT AMERICAN CASINO/TUKWILA	TUKWILA	Jan 15, 1998	Sep 30, 2023	00-12554	67-00012
IMPERIAL PALACE CASINO	AUBURN	Jan 9, 2003	Dec 31, 2022	00-19477	67-00192
JOKER'S CASINO SPORTS BAR & FIESTA CD RM	RICHLAND	Nov 12, 1998	Dec 31, 2022	00-15224	67-00006
LANCER LANES/REST AND CASINO	CLARKSTON	Nov 13, 2008	Sep 30, 2023	00-21681	67-00276
LILAC LANES & CASINO	SPOKANE	Jul 12, 2007	Jun 30, 2023	00-21305	67-00267

<b>Licensed and Operating</b>			<b>38</b>		
	<b>City</b>	<b>Commission Approval Date</b>	<b>License Expiration Date</b>	<b>Org #</b>	<b>License #</b>
MACAU CASINO	TUKWILA	Nov 14, 2019	Sep 30, 2023	00-24514	67-00344
MACAU CASINO	LAKEWOOD	Nov 14, 2019	Sep 30, 2023	00-24516	67-00345
NEW PHOENIX	LA CENTER	Oct 6, 2022	Jun 30, 2023	00-24981	67-00349
NOB HILL CASINO	YAKIMA	Sep 12, 2001	Dec 31, 2022	00-13069	67-00173
PAPAS CASINO RESTAURANT & LOUNGE	MOSES LAKE	Aug 13, 1998	Jun 30, 2023	00-02788	67-00004
RC'S AT VALLEY LANES	SUNNYSIDE	Nov 16, 2017	Mar 31, 2023	00-16220	67-00336
RIVERSIDE CASINO	TUKWILA	Aug 14, 2003	Jun 30, 2023	00-19369	67-00187
ROMAN CASINO	SEATTLE	Feb 10, 2000	Mar 31, 2023	00-17613	67-00057
ROXY'S BAR & GRILL	SEATTLE	Nov 18, 2004	Jun 30, 2023	00-20113	67-00231
SILVER DOLLAR CASINO/MILL CREEK	BOTHELL	Sep 9, 2010	Jun 30, 2023	00-22131	67-00302
SILVER DOLLAR CASINO/RENTON	RENTON	Sep 9, 2010	Jun 30, 2023	00-22134	67-00305
SILVER DOLLAR CASINO/SEATAC	SEATAC	Sep 9, 2010	Jun 30, 2023	00-22128	67-00299
SLO PITCH PUB & EATERY	BELLINGHAM	Aug 12, 1999	Jun 30, 2023	00-16759	67-00038
THE PALACE	LA CENTER	Apr 9, 1998	Jun 30, 2023	00-16903	67-00010
WILD GOOSE CASINO	ELLENSBURG	Apr 8, 2004	Dec 31, 2022	00-20009	67-00212
ZEPPOZ	PULLMAN	Nov 13, 2008	Mar 31, 2023	00-18777	67-00209

<b>Licensed but Not Currently Operating</b>			<b>4</b>		
	<b>City</b>	<b>Commission Approval Date</b>	<b>License Expiration Date</b>	<b>Org #</b>	<b>License #</b>
EMERALD DOWNS	AUBURN	May 11, 2017	Mar 31, 2023	00-23814	67-00335
LUCKY DRAGONZ CASINO	SEATTLE	Mar 10, 2022	Jun 30, 2023	00-23001	67-00323
ROYAL CASINO	EVERETT	Sep 9, 2010	Jun 30, 2023	00-22130	67-00301
WIZARDS CASINO	BURIEN	Feb 11, 2010	Dec 31, 2022	00-21998	67-00287

**Applications Pending****2**

	City	Commission Approval Date	License Expiration Date	Org #	License #
IMPERIAL PALACE CASINO	TUKWILA			00-24893	67-00348
RED DRAGON CASINO	MOUNTLAKE TERRACE			00-22459	67-00315





Washington State Gambling Commission  
Pre-Licensing Report  
Non-profit officer working for multiple  
organizations

Part I  
Licensing/Organization Information

**Type of Approval**

Non-profit officer working for multiple organizations

**Organization**

America For Veterans Foundation 00-24405  
Shriners/Afifi 00-09463

**Date of Application**

11/17/2022

**APPLICANT INFORMATION**

**Name**

Shriners/Afifi

**License Application #**

00-09463

**Business Phone #**

(253) 565-2055

**Address**

PO Box 1433  
Battle Ground, WA 98604

**ACTIVE LICENSES ISSUED BY GAMBLING COMMISSION**

**Description/Class**

Raffle License

**Exp. Date**

12/31/2023

**License Number(s)**

02-21026

**COMMISSION STAFF**

**Licensing Specialist**

Aaron Hutchinson

**Special Agents**

**General Information:**

Ron Fryer is currently the president and raffle activity manager for America for Veterans Foundation. We received a renewal application for a raffle license from Shriners/AFIFI non-profit organization. Mr. Fryer is also the treasurer of the Shriners/AFIFI non-profit organization. We received a request to allow Mr. Fryer to take part in the management or operations of any such gambling activity for both organizations. We do not have a WAC rule allowing or prohibiting them to take part in the management or operation of any gambling activity for multiple organizations. RCW 9.46.120 does not allow them to manage the operation of gambling activities at multiple organizations unless approved by the commission.

**Part II**  
**Licensing Investigations Summary**

Commission's Licensing Unit conducted a criminal records investigation. The investigation found no disqualifying information.

**Part III**  
**Staff Recommendations**

Based upon the licensing investigation, staff recommends allowing Ron Fryer to take part in the management or operation of any such gambling activity for multiple organizations in accordance with RCW 9.46.120.

**Prepared By**

Jennifer LaMont, Agent in Charge  
Licensing Unit

**Signature**



**Date**

December 16, 2022

December 7, 2022

Ronald C. Fryer  
712 NE 130<sup>th</sup> St.  
Vancouver, WA 98685

Gambling Commission Board

Dear Sir or Madam.

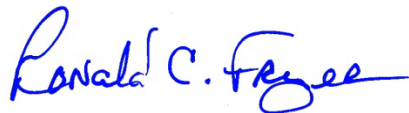
I am requesting permission to be affiliated with both the Shriners/AFIFI 00-094 and America for Veterans Foundation 00-2440563.

America for Veterans Foundation is a charity that myself and my wife started a number of years ago and are in the process of building small homes for homeless women veterans on our property in Vancouver, WA. Our fundraising efforts are done by two vehicle donation companies on our behalf.

Afifi Shrine is a fraternal organization that supports Shriners Hospitals. I am a member of that fraternity and I am directly involved in fundraising for them.

These two organizations are not similar, and are not affiliated. There are no conflicts or associations between these organizations, and both organizations have separate banking accounts and oversight personnel.

Sincerely,

A handwritten signature in blue ink that reads "Ronald C. Fryer". The signature is written in a cursive style with a large initial 'R' and a long, sweeping underline.

Ronald C. Fryer



**Washington State Gambling Commission  
Pre-Licensing Report  
Individual working for multiple non-profit organizations**

**Part I  
Licensing/Organization Information**

<b>Type of Approval</b> Individual working for multiple non-profit organizations	<b>Organization</b> Ducks Unlimited/Connell 00-23305 Ducks Unlimited/Columbia Gorge 00-23170 Ducks Unlimited/Ephrata 00-23288 Ducks Unlimited/Goldendale 00-23149 Ducks Unlimited/Lewis River 00-23140 Ducks Unlimited/Pend Oreille Valley 00-23172 Ducks Unlimited/Quincy 00-23104 Ducks Unlimited/Selah 00-23204 Ducks Unlimited/Spokane 00-23127 Ducks Unlimited/Spokane Valley 00-23158 Ducks Unlimited/Sunnyside 00-23150 Ducks Unlimited/Tri-Cities 00-23351 Ducks Unlimited/Wenatchee 00-23177
<b>Date of Application</b> 12/06/2022	

**APPLICANT INFORMATION**

<b>Name</b> Ducks Unlimited 00044/Chelan	<b>License Application #</b> 00-23137	<b>Business Phone #</b> (509) 630-3352
<b>Address</b> 5009 King Way Anacortes, WA 98221		

**ACTIVE LICENSES ISSUED BY GAMBLING COMMISSION**

<b>Description/Class</b> Raffle License	<b>Exp. Date</b>	<b>License Number(s)</b> 02-09367
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**COMMISSION STAFF**

<b>Licensing Specialist</b> Rose Guzman	<b>Special Agents</b>
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**General Information:**  
Kirk Struble is currently the raffle activity manager for Ducks Unlimited 00044/Chelan. They are requesting to manage the raffle activity for an additional thirteen Ducks Unlimited raffle licenses: Ducks Unlimited/Connell 00-23305, Ducks Unlimited/Columbia Gorge 00-23170, Ducks Unlimited/Ephrata 00-23288, Ducks Unlimited/Goldendale 00-23149, Ducks Unlimited/Lewis River 00-23140, Ducks Unlimited/Pend Oreille Valley 00-23172, Ducks Unlimited/Quincy 00-23104, Ducks Unlimited/Selah 00-23204, Ducks Unlimited/Spokane 00-23127, Ducks Unlimited/Spokane Valley 00-23158, Ducks Unlimited/Sunnyside 00-23150, Ducks Unlimited/Tri-Cities 00-2335, Ducks Unlimited/Wenatchee 00-23177. We received a request to allow Mr. Struble to take part in the management or operations of any such gambling activity for all fourteen organizations. We do not have a WAC rule allowing or prohibiting them to take part in the management or operation of any gambling activity for multiple organizations. RCW 9.46.120 does not allow them to manage the operation of gambling activities at multiple organizations unless approved by the commission.

**Part II**  
**Licensing Investigations Summary**

Commission's Licensing Unit conducted a criminal records investigation. The investigation found no disqualifying information.

**Part III**  
**Staff Recommendations**

Based upon the licensing investigation, staff recommends allowing Kirk Struble to take part in the management or operation of any such gambling activity for multiple organizations in accordance with RCW 9.46.120.

**Prepared By**

Jennifer LaMont, Agent in Charge  
Licensing Unit

**Signature**



**Date**

December 16, 2022

Ducks Unlimited  
1 Waterfowl Way  
Memphis, TN 38120

November 28, 2022

Washington State Gambling Commission  
4565 7<sup>th</sup> Ave SE  
Lacey, WA 98503

To the Board of the WSGC,

I am writing this letter at the suggestion of Ms. Rose Guzman regarding your updated procedures surrounding RCW 9.46.120, which in part states that, “no person who takes any part in the management or operation of any gambling activity shall take any part in the management or operation of any gambling activity conducted by any other organization or any other branch of the same organization unless approved by the commission.” The purpose of this letter is to request the Commission’s approval that I, Kirk Struble, as the Regional Director of Event Fundraising for Ducks Unlimited (DU) in East and Southwest Washington, may take part in the management and operation of gambling activity for the following licensees as the Gambling Activity Manager:

00-23137 Ducks Unlimited 00044/Chelan	00-23104 Ducks Unlimited/Quincy
00-23305 Ducks Unlimited/Connell	00-23204 Ducks Unlimited/Selah
00-23170 Ducks Unlimited/Columbia Gorge	00-23127 Ducks Unlimited/Spokane
00-23288 Ducks Unlimited/Ephrata	00-23158 Ducks Unlimited/Spokane Valley
00-23149 Ducks Unlimited/Goldendale	00-23150 Ducks Unlimited/Sunnyside
00-23140 Ducks Unlimited/Lewis River	00-23351 Ducks Unlimited/Tri-Cities
00-23172 Ducks Unlimited/Pend Oreille Valley	00-23177 Ducks Unlimited/Wenatchee

DU is a volunteer driven organization. Each of its chapters is operated by local volunteers that fundraise in various ways to support the larger mission of DU: the protection of wetlands and waterfowl including those in the State of Washington. Most of DU’s volunteers have careers, community and family commitments that may take priority over their volunteer commitments with DU. As DU’s event system runs on a yearly basis, the volunteer work is generally confined to a short period of time in the year.

In my role as a Regional Director for DU in the State of Washington, I assist these chapters with their fundraising events in various ways: I communicate regularly with the volunteers and national organization, set goals, recruit volunteers and help with paperwork.

DU and the WSGC share a common goal of ensuring that all reports are filed in a timely fashion and licenses renewed when necessary, as well as ensuring that such reporting is consistent with WSGC rules and procedures across all of our licensees. I am best positioned to assist these volunteers with the quarterly reports and licenses that may otherwise be forgotten.

In the past, DU held just a single gambling license in the state which made this a non-issue. At the request of the WSGC, however, each of our chapters now holds their own license. Granting this request would allow me to be involved in the management and operation of multiple license holders, and I humbly request that the Washington State Gambling Commission Board grants me the approval to continue to do so.

Respectfully,

Kirk A. Struble, Ducks Unlimited Regional Director, E & SW WA



**Washington State Gambling Commission  
Pre-Licensing Report  
Individual working for multiple non-profit organizations**

**Part I  
Licensing/Organization Information**

<b>Type of Approval</b> Individual working for multiple non-profit organizations	Ducks Unlimited/ Bellevue 00-23186 Ducks Unlimited/Bellingham 00-23211 Ducks Unlimited/Burien 00-23205
<b>Date of Application</b> 12/06/2022	Ducks Unlimited/Enumclaw 00-24023 Ducks Unlimited/Everett 00-23180 Ducks Unlimited/Federal Way 00-23100 Ducks Unlimited/Gig Harbor 00-23173 Ducks Unlimited/Kitsap County 00-23151 Ducks Unlimited/Nisqually Delta 00-23255 Ducks Unlimited/Oak Harbor 00-23184 Ducks Unlimited/Olympia 00-23134 Ducks Unlimited/Puyallup 00-23249 Ducks Unlimited/Seattle 00-23128 Ducks Unlimited/Sky Valley 00-23188 Ducks Unlimited/Snoqualmie Valley 00-23218 Ducks Unlimited/Stanwood 00-23130 Ducks Unlimited/Tacoma 00-23143

**APPLICANT INFORMATION**

<b>Name</b> Ducks Unlimited/Ballard	<b>License Application #</b> 00-23181	<b>Business Phone #</b> (425) 231-8928
<b>Address</b> 6411 Seaview Ave NW Seattle, WA 98117		

**ACTIVE LICENSES ISSUED BY GAMBLING COMMISSION**

<b>Description/Class</b> Raffle license	<b>Exp. Date</b>	<b>License Number(s)</b> 02-09398
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**COMMISSION STAFF**

<b>Licensing Specialist</b> Rose Guzman	<b>Special Agents</b>
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**General Information:**

Mr. Heep would like to be the raffle activity manager for Ducks Unlimited Ballard, as well as seventeen other Ducks Unlimited raffle licensees: Ducks Unlimited /Bellevue 00-23186, Ducks Unlimited /Bellingham 00-23211, Ducks Unlimited /Burien 00-23205, Ducks Unlimited /Enumclaw 00-24023, Ducks Unlimited /Everett 00-23180, Ducks Unlimited /Federal Way 00-23100, Ducks Unlimited /Gig Harbor 00-23173, Ducks Unlimited /Kitsap County 00-23151, Ducks Unlimited /Nisqually Delta 00-23255, Ducks Unlimited /Oak Harbor 00-23184, Ducks Unlimited /Olympia 00-23134, Ducks Unlimited /Puyallup 00-23249, Ducks Unlimited /Seattle 00-23128, Ducks Unlimited /Sky Valley 00-23188, Ducks Unlimited /Snoqualmie Valley 00-23218, Ducks Unlimited /Stanwood 00-23130, Ducks Unlimited /Tacoma 00-23143. We received a request to allow Mr. Heep to take part in the management or operations of any such gambling activity for all eighteen organizations. We do not have a WAC rule allowing or prohibiting

them to take part in the management or operation of any gambling activity for multiple organizations. RCW 9.46.120 does not allow them to manage the operation of gambling activities at multiple organizations unless approved by the commission.

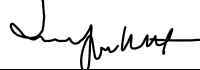
**Part II  
Licensing Investigations Summary**

Commission's Licensing Unit conducted a criminal records investigation. The investigation found no disqualifying information.

**Part III  
Staff Recommendations**

Based upon the licensing investigation, staff recommends allowing Dan Heep to take part in the management or operation of any such gambling activity for multiple organizations in accordance with RCW 9.46.120.

**Prepared By**  
Jennifer LaMont, Agent in Charge  
Licensing Unit

**Signature**  


**Date**  
December 16, 2022



Ducks Unlimited  
1 Waterfowl Way  
Memphis, TN 38120

November 29, 2022

Washington State Gambling Commission  
4565 7<sup>th</sup> Ave SE  
Lacey, WA 98503

To the Board of the WSGC,

I am writing this letter at the suggestion of Ms. Rose Guzman regarding your updated procedures surrounding RCW 9.46.120, which in part states that, “no person who takes any part in the management or operation of any gambling activity shall take any part in the management or operation of any gambling activity conducted by any other organization or any other branch of the same organization unless approved by the commission.” The purpose of this letter is to request the Commission’s approval that I, Daniel Heep, as the Regional Director of Event Fundraising for Ducks Unlimited (DU) in Northwest Washington, may take part in the management and operation of gambling activity for the following licensees as the Gambling Activity Manager:

00-23181	DUCKS UNLIMITED/BALLARD
00-23186	DUCKS UNLIMITED/BELLEVUE
00-23211	DUCKS UNLIMITED/BELLINGHAM
00-23205	DUCKS UNLIMITED/BURIEN
00-24023	DUCKS UNLIMITED/ENUMCLAW
00-23180	DUCKS UNLIMITED/EVERETT
00-23100	DUCKS UNLIMITED/FEDERAL WAY
00-23173	DUCKS UNLIMITED/GIG HARBOR
00-23151	DUCKS UNLIMITED/KITSAP COUNTY
00-23255	DUCKS UNLIMITED/NISQUALLY DELTA
00-23184	DUCKS UNLIMITED/OAK HARBOR
00-23134	DUCKS UNLIMITED/OLYMPIA
00-23249	DUCKS UNLIMITED/PUYALLUP
00-23128	DUCKS UNLIMITED/SEATTLE
00-23188	DUCKS UNLIMITED/SKY VALLEY
00-23218	DUCKS UNLIMITED/SNOQUALMIE VALLEY
00-23130	DUCKS UNLIMITED/STANWOOD
00-23143	DUCKS UNLIMITED/TACOMA

DU is a volunteer driven organization. Each of its chapters is operated by local volunteers that fundraise in various ways to support the larger mission of DU: the protection of wetlands and waterfowl including those in the State of Washington. Most of DU’s volunteers have careers, community and family commitments that may take priority over their volunteer commitments with DU. As DU’s event system runs on a yearly basis, the volunteer work is generally confined to a short period of time in the year.

In my role as a Regional Director for DU in the State of Washington, I assist these chapters with their fundraising events in various ways: I communicate regularly with the volunteers and national organization, set goals, recruit volunteers and help with paperwork.

DU and the WSGC share a common goal of ensuring that all reports are filed in a timely fashion and licenses renewed when necessary, as well as ensuring that such reporting is consistent with WSGC rules and procedures across all of our licensees. I am best positioned to assist these volunteers with the quarterly reports and licenses that may otherwise be forgotten.

In the past, DU held just a single gambling license in the state which made this a non-issue. At the request of the WSGC, however, each of our chapters now holds their own license. Granting this request would allow me to be involved in the management and operation of multiple license holders, and I humbly request that the Washington State Gambling Commission Board grants me the approval to continue to do so.

Respectfully,

Daniel Heep, Ducks Unlimited Regional Director, NW WA

A handwritten signature in cursive script that reads "Daniel Heep".



**STATE OF WASHINGTON  
GAMBLING COMMISSION**

*“Protect the Public by Ensuring that Gambling is Legal and Honest”*

January 5, 2023

**TO: COMMISSIONERS**

Alicia Levy, Chair  
Julia Patterson, Vice-Chair  
Bud Sizemore  
Sarah Lawson

**EX OFFICIO MEMBERS**

Senator Steve Conway  
Senator Jeff Holy  
Representative Shelley Kloba  
Representative Brandon Vick

**FROM:** Tina Griffin, Director



**SUBJECT:** January 2023 Director’s Report

**Problem Gambling Task Force’s Final Report to the Legislature**

On December 22, 2022, the Problem Gambling Task Force’s (“PGTF”) “Recommendations for Improving Problem Gambling Prevention, Treatment, and Recovery in Washington State” was submitted to the legislative committees.

The PGTF recommended the following:

<p>I. Comprehensive Problem Gambling Services</p>	<ul style="list-style-type: none"> <li>* Improve availability and access to all levels of treatment and recovery support services for problem gambling</li> <li>* Integrate problem gambling awareness, prevention, education, outreach, treatment, and recovery support services into behavioral health and substance use disorder programs</li> <li>* Integrate problem gambling information into clinical behavioral health curriculum, training, and counseling programs</li> <li>* Enhance consumer protections and responsible gaming for vendors, operators, and the public, including youth</li> <li>* Recognize impacts of internet use and gaming disorders on youth and adults</li> <li>* Assess the potential of including a gambling treatment diversion program within existing Washington State courts</li> </ul>
---	--

II. Funding & Infrastructure	<ul style="list-style-type: none"> <li>* Increase state funding for the State Problem Gambling Program to meet current and future needs</li> <li>* Implement a new data system for the State Problem Gambling Program</li> </ul>
III. Collaboration & Partnerships	<ul style="list-style-type: none"> <li>* The Governor, Washington State Gambling Commission, and Washington State Health Care Authority should work collaboratively with the state legislature, Tribal governments, relevant state agencies, and key stakeholders to determine funding and service strategies to best meet the needs of WA State residents</li> </ul>

The following recommendations are for action by the Gambling Commission:

I. Comprehensive Problem Gambling Services

Enhance consumer protections and responsible gaming for vendors, operators, and the public, including youth

- Determine and decide which state agency will take the lead role in advancing consumer protections for existing and newly legalized gambling activities in the future. This would likely be initiated by WSGC, HCA/DBHR, and the Washington State Attorney General.
- Incorporate responsible gambling education for players in brick-and-mortar vendors and operators, including odds/stats, common distortions, and problem gambling resources. Examples of common thought distortions are thinking ‘this machine is hot and will pay out’, ‘this machine just paid out so I won’t win again today,’ general superstitions about luck, lucky charms, rabbits feet, and ‘I should play these lucky numbers because X-Y-Z happened today.’ This would likely be initiated by ECPG, WSGC, and HCA/DBHR.
- Washington State Gambling Commission will identify a staff position within the agency to be a resource person for staff and Commissioners on responsible gambling. This would likely be initiated by WSGC.

II. Funding and Infrastructure  
No recommendations

III. Collaboration and Partnerships

The Governor, the Washington State Gambling Commission, and the Washington State Health Care Authority should work collaboratively with the

state legislature, Tribal governments, relevant state agencies, and key stakeholders to determine funding and service strategies to best meet the needs of Washington state residents.

With the sunset of this legislative task force there will no longer be an organized space for conversations in the problem gambling space. This recommendation calls on the key parts of state and Tribal governments to continue dialogue and proposing recommendations to support comprehensive problem gambling services for all our residents. This would likely be initiated by the WSGC and HCA/DBHR, in collaboration with ECPG, Tribal governments, state legislature, and state agency partners.

The full report and appendices can be found on our website at <https://wsgc.wa.gov/self-exclusion/problem-gambling>.

### **House-Banked Card Room Financial Statements for Fiscal Year 2021**

A summary of the financial statements submitted by house-banked card rooms for fiscal year 2021 are summarized in the attached memorandum and “Summary of House-Banked Card Room Financial Statements for the Fiscal Year Ending in 2021 Sorted by Licensee Net Income or (Loss).”

December 2022

# Recommendations for Improving Problem Gambling Prevention, Treatment & Recovery in WA State

*Submitted to:*  
Washington State Legislature

*Submitted on behalf of the Problem Gambling Task Force by:*  
Washington State Gambling Commission

# Acknowledgements

The Problem Gambling Task Force's leadership team recognizes that Task Force members spent many hours serving on the Task Force and its six committees over the past three years (January 2020 to November 2022).

A heartfelt thank you to everyone who supported this work, including legislators, non-profit organizations, Tribal representatives, state agencies, community members, representatives from commercial and Tribal gaming, clinical professionals, and our consultant facilitators for your dedicated and important service.

Despite impacts from the COVID-19 pandemic, including moving to online meetings and the need to extend the work by an additional year, PGTF members and staff consultants met these challenges with grace and patience. Members have come together to create and finalize this list of recommendations now being shared with the Legislature and people of Washington State.

## Participating Problem Gambling Task Force Members

### Legislators

- Senator Steve Conway
- Representative Shelley Kloba

### WA State Agencies

- Department of Health (Tim Farrell, Policy & Leg. Dev. Dir.)
- Gambling Commission (Commissioner Julia Patterson / Exec. Dir. Tina Griffin / Tommy Oakes / Past Exec. Dir. Dave Trujillo / Brian Considine)
- Health Care Authority / DBHR (Dir. Keri Waterland / Anthony Edwards-Lenton, Prevention / Ryan Keith, Recovery Navigator Pgm. / Roxane Waldron, Mgr. Problem Gambling Pgm.)
- Horse Racing Commission (Deputy Sec. Amanda Benton)
- State Lottery (Kristi Weeks, Dir. Legislative & Legal Affairs)

### Non-Profit Organizations

(problem gambling treatment & recovery)

- Evergreen Council on Problem Gambling (Exec. Dir. Maureen Greeley / Assoc. Dir. Tana Russell)
- Recovery Cafe Network (Dir. of Programs, Ruby Takushi)—PhD Psychologist

# Acknowledgements

## Clinical Professionals (problem gambling treatment & recovery)

- Hilarie Cash (Chief Clinical Officer, reSTART Life)—PhD, LMHC, CSAT, CPGC
- Brad Galvin (Principal, Brief Therapy Works)—MS, SUDP, LMHC, LPC, ICGC-II
- Harumi Hashimoto (Clinical Dir., Recovery Services, Asian Counseling & Referral Service)
- Melissa Hurt-Moran (CD Clinical Mgr., Camas Path, Kalispel Tribe of Indians)—SUDP
- Ty Lostutter (Psychologist, Research University of Washington)—PhD
- Ricki Peone (Health & Human Services Dir., Spokane Tribe of Indians)—MSW, ICGC-II, BACC
- Cosette Rae (CEO, reSTART Life)—MSW, LICSW, ACSW, EMBA, WSCGC-II

## Community Members

- Richelle Madigan (Member, Behavioral Health Advisory Council)
- Susan Kydd (Member, Behavioral Health Advisory Council)
- Nanci Watson (Member, Behavioral Health Advisory Council)

## Licensed Commercial Gambling Business

- Maverick Gaming  
(Pres. of Operations Tim Merrill / Vicki Christophersen)

## Tribal Gaming Operation Organizations

- Dallas Burnett (Dir., Squaxin Island Tribal Regulatory Authority)
- Brandi Crowe (Exec. Dir., Puyallup Tribal Gaming Agency)
- Rosina DePoe (Deputy Dir., WA Indian Gaming Association)
- Rebecca George (Exec. Dir., WA Indian Gaming Association)
- Kevin Zenishek (Exec. Dir., Casino Operations, Northern Quest Resort & Casino, Kalispel Tribe)

## Tribal Representatives

- Alexandria Desautel (Exec. Dir., Lake Roosevelt Community Center)
- Amber Lewis (Lewis Consulting, on behalf of Chair Forsman & Suquamish Tribe)
- Glen Nenema (Chairman, Kalispel Tribe)
- Richard Swan, Sr. (Councilman, Colville Tribes)

## Uncommon Solutions, Inc. (facilitators & consultants)

- Victor Colman, Co-Principal
- Ethan Meade, Consultant
- Meg O'Leary, Consultant

## Funding Acknowledgements

- Washington State Legislature
- State Problem Gambling Program (HCA / DBHR)
- Evergreen Council for Problem Gambling



# Message from the PGTF Chair & Vice-Chair

In 2019, the Washington State Legislature created the Joint Legislative Problem Gambling Task Force. It was created to address growing concerns about the impact of problem gambling on the residents of Washington State. Task Force membership includes legislators, state agencies, Tribal representatives, and stakeholders from clinical, gambling industry, recovery, community, and other sectors. While the emergence of the worldwide pandemic delayed our work by a full year, we are pleased to provide this comprehensive Final Report.

With an increasing number of ways to gamble, the work of this Task Force is extremely timely. The Task Force's work includes assessing the need for problem gambling-related services, whether the State is meeting those needs, identifying existing gaps, and, finally, making recommendations to the state legislature for improvements.

The entire Task Force has been meeting quarterly since January 2020. Topical workgroups were established to delve deeper and develop recommendations and strategies. In addition, the Washington State Health Care Authority was appropriated \$500,000 from the state problem gambling account for completion of an Adult Problem Gambling Prevalence Study. The findings of this study, along with multiple other data inputs, have enabled the Task Force to take an evidence-based approach to our work.

While our society increasingly understands the importance of providing services to address substance use disorder and mental health issues, the lack of federal funding for problem gambling services (including prevention, treatment, and recovery) is often left out of the equation. We hope this Final Report is a step toward positioning problem gambling as an issue that demands attention, deliberation, and resources.

**Chair Julia Patterson**



**Vice-Chair Brad Galvin**



# Acronyms

<b>CAWI</b>	Computer-Assisted Web Interviewing
<b>CMS</b>	Center for Medicare and Medicaid Services
<b>DOH</b>	Department of Health – Washington State
<b>DSM-5</b>	Diagnostic and Statistical Manual of Mental Health Disorders, 5th Edition
<b>ECPG</b>	Evergreen Council on Problem Gambling
<b>HCA</b>	Health Care Authority – Washington State
<b>DBHR</b>	Division of Behavioral Health and Recovery – WA State Health Care Authority
<b>DSHS</b>	Department of Health and Human Services – Washington State
<b>GF-S</b>	State General Funds
<b>GIS</b>	Geographic Information System
<b>HYS</b>	Healthy Youth Survey – Washington State
<b>ICGC</b>	International Gambling Counselor Certification
<b>ICRG</b>	International Center for Responsible Gaming
<b>LGBTQIA</b>	Lesbian, Gay, Bisexual, Transgender, Queer, Intersex, Asexual
<b>NAADGS</b>	National Association of Administrators for Disordered Gambling Services
<b>NCPG</b>	National Council on Problem Gambling

# Acronyms

<b>NWITC</b>	Northwest Indian Treatment Center
<b>OSPI</b>	Office of Superintendent of Public Instruction – Washington State
<b>PGAM</b>	Problem Gambling Awareness Month
<b>PGTF</b>	Problem Gambling Task Force
<b>RCW</b>	Revised Code of Washington
<b>SAMHSA</b>	Substance Abuse and Mental Health Services Administration
<b>SAQ</b>	Self-Administered Questionnaire – Paper-and-Pencil
<b>SESRC</b>	Social & Economic Sciences Research Center – Washington State University
<b>SFY</b>	State Fiscal Year
<b>UW</b>	University of Washington
<b>WAC</b>	Washington Administrative Code
<b>WHO</b>	World Health Organization
<b>WIGA</b>	Washington Indian Gaming Association
<b>WRA</b>	WA Recovery Alliance
<b>WSGC</b>	Washington State Gambling Commission
<b>WSGCC</b>	Washington State Gambling Counselor Certification Committee

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WA State Problem Gambling Program

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APPENDIX E      PGTF Roster

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APPENDIX K      ECPG Glossary

APPENDIX L      ECPG Additional Resources

APPENDIX M      Timeline of Gambling & Problem Gambling  
Services in WA State

# 1 | Overview and Highlights

## Three-Year Collaboration Illuminates Recommendations

This report represents the successful three-year collaboration among Problem Gambling Task Force (PGTF) members and subject matter experts. The recommendations and strategies reflect their deep expertise and perspective and offer a road map for improved problem gambling awareness, prevention, treatment, and recovery services in Washington State.

After gathering a broad-based and motivated group of stakeholders, the PGTF got right to work through a comprehensive review of current problem gambling services to surface gaps and develop recommendations. Our work was also informed by multiple sources of data and information, including the recently released 2021 Washington State Adult Problem Gambling Prevalence Study.

Our gap analysis and review of other state problem gambling programs reveals that our current state program lacks the requisite resources to provide comprehensive problem gambling services statewide. Despite that the federal government funds mental health and substance use disorder services, the fact remains that the federal government provides no funding support for problem gambling services.

Advancing work in each of the recommended areas is critical to meet the dynamic challenges brought forward by the increased availability of gambling across our state.

Problem gambling is a behavioral health issue that currently stands outside mainstream behavioral health services and funding. It is past time to remedy that situation and offer Washington State residents a complete suite of problem gambling services, especially now—when access to and availability of gambling is rapidly expanding nationally and worldwide, with increasing pressure on legislators to legalize sports wagering and online gambling.

## Problem Gambling Services – Key Gaps in WA State

<b>Prevention</b>	<ul style="list-style-type: none"> <li>* Multiple efforts in play across public, private, and Tribal nations</li> <li>* Not integrated with other prevention efforts (State)</li> </ul>
<b>Residential &amp; Non-Residential Treatment</b>	<ul style="list-style-type: none"> <li>* State program clearly underfunded</li> <li>* Problem gambling treatment coverage spotty across the state</li> <li>* Residential treatment unavailable through the state program</li> <li>* Nearest residential treatment program for gambling is in Salem, Oregon</li> </ul>
<b>After-Care Recovery Support</b>	<ul style="list-style-type: none"> <li>* Very little available that directly addresses problem gambling</li> <li>* Few problem gambling-trained peer and recovery support specialists</li> </ul>
<b>Program Monitoring &amp; Evaluation</b>	<ul style="list-style-type: none"> <li>* Prevalence studies should be done periodically, especially in an era where the availability of gambling is increasing</li> </ul>

## Problem Gambling Task Force Recommendations

<p><b>I. Comprehensive Problem Gambling Services</b></p>	<ul style="list-style-type: none"> <li>* Improve availability and access to all levels of treatment and recovery support services for problem gambling</li> <li>* Integrate problem gambling awareness, prevention, education, outreach, treatment, and recovery support services into behavioral health and substance use disorder programs</li> <li>* Integrate problem gambling information into clinical behavioral health curriculum, training, and counseling programs</li> <li>* Enhance consumer protections and responsible gaming for vendors, operators, and the public, including youth</li> <li>* Recognize impacts of internet use and gaming disorders on youth and adults</li> <li>* Assess the potential of including a gambling treatment diversion program within existing Washington State courts</li> </ul>
<p><b>II. Funding &amp; Infrastructure</b></p>	<ul style="list-style-type: none"> <li>* Increase state funding for the State Problem Gambling Program to meet current and future needs</li> <li>* Implement a new data system for the State Problem Gambling Program</li> </ul>
<p><b>III. Collaboration &amp; Partnerships</b></p>	<ul style="list-style-type: none"> <li>* The Governor, Washington State Gambling Commission, and Washington State Health Care Authority should work collaboratively with the state legislature, Tribal governments, relevant state agencies, and key stakeholders to determine funding and service strategies to best meet the needs of WA State residents</li> </ul>



## 2 | Gap Analysis: Problem Gambling Services

### Laying the Groundwork for the Recommendations

This section lays the groundwork for the recommendations and strategies found in the next section. See below for a thorough examination of current services and identified gaps. After much analysis and deliberation within the Task Force, members determined that there is a clear need to increase the accessibility and availability of problem gambling services. State agencies that have gambling, behavioral health, and related topics within their scope of responsibility need to work together to create a stronger infrastructure to serve people impacted by problem gambling. Collaboration by all sectors that touch upon problem gambling, along with more resources, are needed to bridge these identified gaps, with intentional focus to those populations and groups at higher risk for problem gambling.

To proactively respond to the gaps identified in the State Problem Gambling Program (State Program), the Washington State Health Care Authority Division of Behavioral Health and Recovery (HCA/DBHR) has put forth a Proposed Budget model that will significantly expand the services that the program now provides, both in numbers served and the breadth of the impact statewide.

This model will change the State Program from one that has, since it began in 2005, been focused on treatment reimbursement into a modern comprehensive program like those offered in states with robust problem gambling programs.<sup>1</sup> (Appendix A: Current & Proposed Budget Models – WA State Problem Gambling Program)

If funding for the State Program is doubled, based on the Proposed Model, these are the 3-5 year goals for the Program:

- **Prevention:** Initiate a year-round State Program
- **Treatment:** Increase treatment services to serve up to 700 clients annually<sup>2</sup>
- **Workforce Development:** Increase current number of Certified Gambling Counselors by a minimum of 25 percent<sup>3</sup>
- **Outreach, Awareness, and Education:** Increase outreach to community organizations and populations at higher risk for problem gambling
- **Program Monitoring and Evaluation:** Contract services with the University of Washington (UW) or other entity for continuous quality improvement as well as tracking and assessing outcomes based on quality of life for clients
- **Research:** Conduct a replication Prevalence Study and/or other research to assess the changing landscape of gambling to address access to care issues and health disparities.<sup>4</sup>

## Existing Problem Gambling Services in Washington State

### **Problem Gambling Prevention, Outreach, Awareness & Education Services**

Several entities within Washington State are known to conduct or have conducted problem gambling prevention activities:

- Evergreen Council on Problem Gambling (ECPG)
- Individual behavioral health agencies
- Recovery Cafe Network
- State Problem Gambling Program
- Tribal behavioral health agencies

Annually in March, during Problem Gambling Awareness Month (PGAM), the State Program coordinates and funds several specific PGAM-related activities with ECPG. Beyond the \$26,000 annually that is contracted with ECPG, HCA does not receive state or federal funding to initiate and sustain a robust, year-round problem gambling prevention program. Due to this lack of funding, problem gambling prevention is not integrated with all the other behavioral health topics, despite the high rate of co-occurring disorders that are correlated with problem gambling.

Many Tribes provide a significant amount of prevention and awareness-related activities. With funds set aside for problem gambling, Tribes may also choose to support prevention and other problem gambling services by contributing to non-profits and/or the state problem gambling account.

ECPG and the Recovery Cafe Network are two organizations that have received funding from Tribes, some of which has been used to support prevention, awareness, education, outreach, and other problem gambling services.

In addition to PGAM programming, ECPG hosts two conferences each year (Focus on the Future and Four Directions) that include concurrent sessions on a variety of topics related to problem gambling, including prevention and education, awareness, and outreach across the lifespan. ECPG also conducts on-going trainings on prevention topics focused on youth, young adults, older adults, Latino/Hispanic, Tribal, LGBTQIA, military/veterans, recovery community, and other populations at increased risks for problem gambling.<sup>5</sup>

### **Treatment Services**

To understand the extent of assessment and treatment services,<sup>6</sup> the PGTF collected information on the following resources:

- Certified Gambling Counselor (CGC) workforce<sup>7</sup>
- DOH-certified problem gambling treatment agencies<sup>8</sup>
- Tribal behavioral health agencies with problem gambling programs<sup>9</sup>

Using information on the locations of treatment services and data of land-based (brick and mortar) gambling locations, PGTF staff created a series of maps in ArcGIS.<sup>10</sup> Using this method allowed staff to create maps that show the gambling venues, problem gambling treatment service coverage, and the overlapping one-hour drive times.<sup>11</sup>

The following maps, when viewed in order, illustrate the method used by the PGTF to determine in which geographic areas of the state are currently unserved by a Certified Gambling Counselor. Based on this analysis, this report recommends increased workforce development to expand availability to the areas listed later in this section. (Appendix B: Availability of Gambling & Problem Gambling Treatment in WA State – GIS Maps)

**FIGURE A**<sup>12, 13, 14, 15</sup> (see all maps at the end of this chapter) shows the locations and one-hour drive time area coverage of all Certified Gambling Counselors and all Tribal behavioral health agencies.<sup>12</sup> Some Tribal behavioral health agencies employ Certified Gambling Counselors.<sup>13</sup> Among those Tribal agencies that do, several are Department of Health (DOH)-certified problem gambling behavioral health agencies.<sup>14</sup>

### Treatment Availability Findings

- Existing treatment services are widely available on the western side of the Cascades and along the I-5 interstate freeway corridor.
- The Spokane and Greater Columbia regions have partial coverage for problem gambling treatment within a one-hour drive.
- Large geographic areas of the state have no problem gambling treatment within a one-hour drive time. This includes both population centers and rural counties.

The next step in determining where additional treatment services are needed is to see the scope and availability of land-based gambling.

**FIGURE B**<sup>16</sup> shows the locations and one-hour drive time overlaps of traditional brick-and-mortar gambling by activity type, including

house-banked commercial card rooms, Tribal casinos, and horse racing (both track and off-track/pari-mutuel).<sup>16</sup>

As seen in Figure A, land-based gambling within one-hour drive time can be accessed in large areas of the state, with multiple types of gambling in some areas.

Once the availability of land-based gambling and problem gambling treatment was understood, staff created **FIGURE C**.<sup>17, 18</sup> The map shows the overlay of land-based gambling with Certified Gambling Counselors.

At this point in the analysis, it's important to highlight that the Program contracts only with DOH-certified problem gambling agencies as well as licensed mental health providers and/or substance use disorder professionals who are Certified Gambling Counselor sole providers (defined in the Behavioral Health WAC 246-341-0754). In the proviso that created the PGTF, one of the required tasks is to make recommendations to the Legislature regarding whether this state should expand state funding for prevention, treatment, and recovery services to address the need for these programs.<sup>19</sup>

### Tribal Behavioral Health Agencies Providing Problem Gambling Treatment Services

Tribal behavioral health agencies that do not currently employ a Certified Gambling Counselor but may offer problem gambling treatment, as indicated on their website, are not included in this portion of the analysis. It is worth noting that most Tribal clinics accept both Tribal and non-Tribal clients.<sup>20, 21, 22</sup>

## Identified Gaps in Locations of Certified Gambling Counselors

Having completed the mapping project, PGTF staff were able to determine which regions or population centers are currently unserved or under-served for problem gambling treatment services (i.e., do not have any DOH-certified problem gambling agencies or Certified Gambling Counselors within one-hour drive time). Based on this information as well as population density within areas, PGTF staff created a new map that shows where the greatest need is for problem gambling treatment services. State-certified problem gambling services include 1) Certified Gambling Counselors, and 2) DOH-certified problem gambling agencies. To expand state-certified problem gambling treatment services to these areas will require increasing the number of Certified Gambling Counselors by a minimum of 25 percent (ten additional clinicians). And to meet future anticipated needs, ongoing recruitment of Certified Gambling Counselors is crucial.

**FIGURE D** illustrates the boundaries of the proposed areas for Certified Gambling Counselors. There are additional areas that are currently under-served that are not on this map but are on the list for additional recruitment (Thurston and Pierce Counties, for example).

**FIGURE E** is the final map and dramatically illustrates the impact of expanding the Certified Gambling Counselor workforce. Based on this analysis, the PGTF is recommending that the Certified Gambling Counselor workforce be increased, focusing on the need to increase access to state-certified problem gambling treatment for unserved and under-served areas and population centers. This includes the need for more state funding to increase workforce development efforts, for example, more clinical trainings online, scholarships for candidates in

under-served areas, and other actions to reduce barriers and increase successful recruitment for new Certified Gambling Counselors.<sup>23</sup>

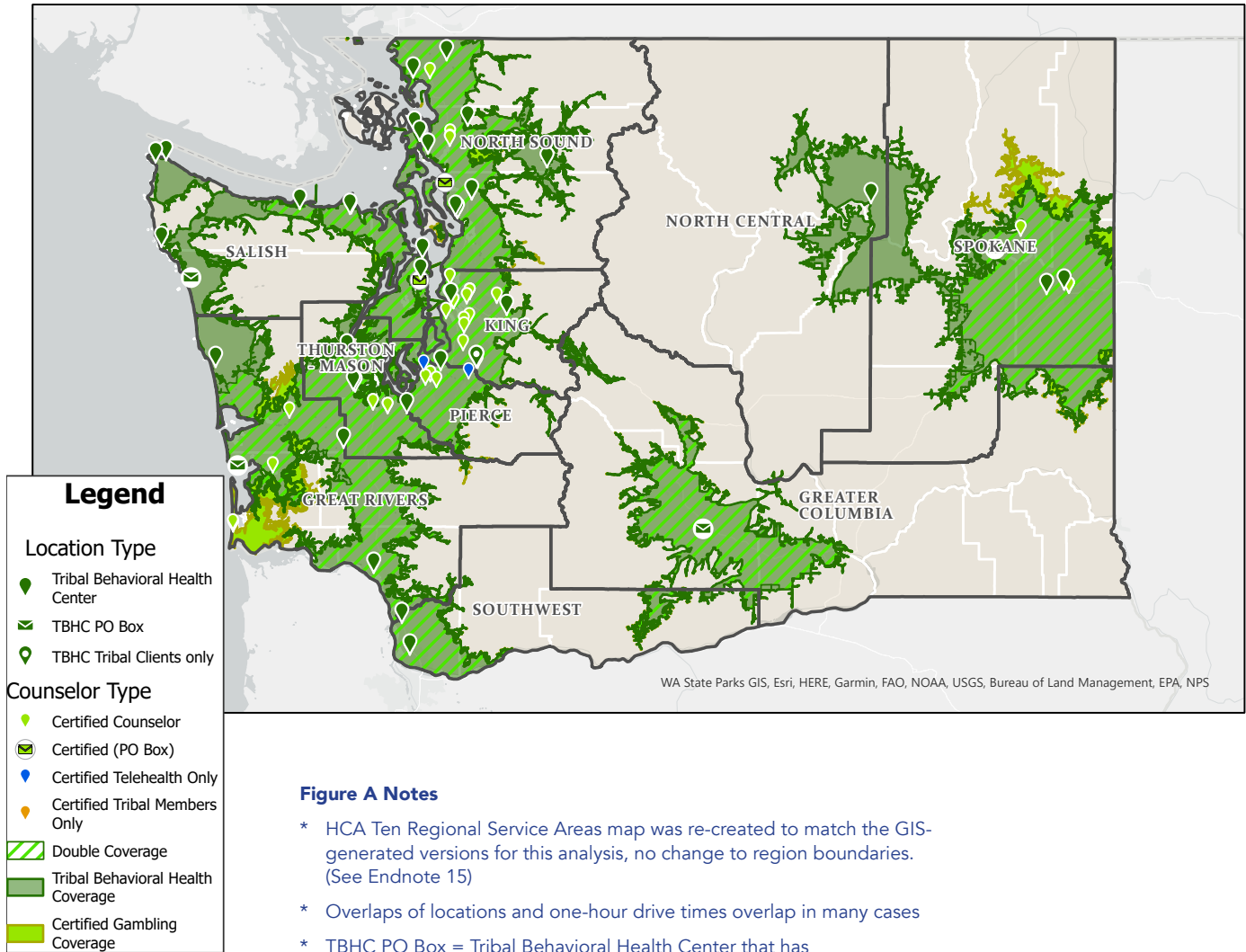
The goal of this expansion is to ensure that population centers have access to Certified Gambling Counselors. This plan will increase overall coverage of the population by over an additional 600,000 people, primarily focused in eastern and rural parts of the state that don't currently have access to treatment with a Certified Gambling Counselor.<sup>24</sup>

Regionally, when fully implemented, this plan to increase the Certified Gambling Counselor workforce will expand access to state-certified problem gambling treatment (light green areas) to include the yellow coverage areas (**Figure E**). The most dramatic increases in coverage will be on the eastern side of the Cascades (reported here as the percentage of the population in the region that will be within one-hour drive time, not physical geographic coverage).

For individuals in areas outside of the one-hour drive time access to state-certified problem gambling treatment, options may be available:

- **Telehealth:** The availability of clinical treatment via telehealth has greatly expanded in the past three years. Many of the state-certified problem gambling treatment providers now offer telehealth as an option. Services can be accessed (including telehealth) through the Problem Gambling Helpline (1-800-547-6133).<sup>25</sup>
- **Tribal behavioral health agencies:** As noted earlier, some Tribal behavioral health agencies have problem gambling programs. Individuals are encouraged to reach out to their local Tribal behavioral health agency for more information, as mental health and substance use disorder treatment is often available for both Tribal and non-Tribal community members.<sup>26</sup>

**Figure A:** Tribal Behavioral Health Agency Coverage & Certified Gambling Counselor Coverage (based on ten regional service areas)

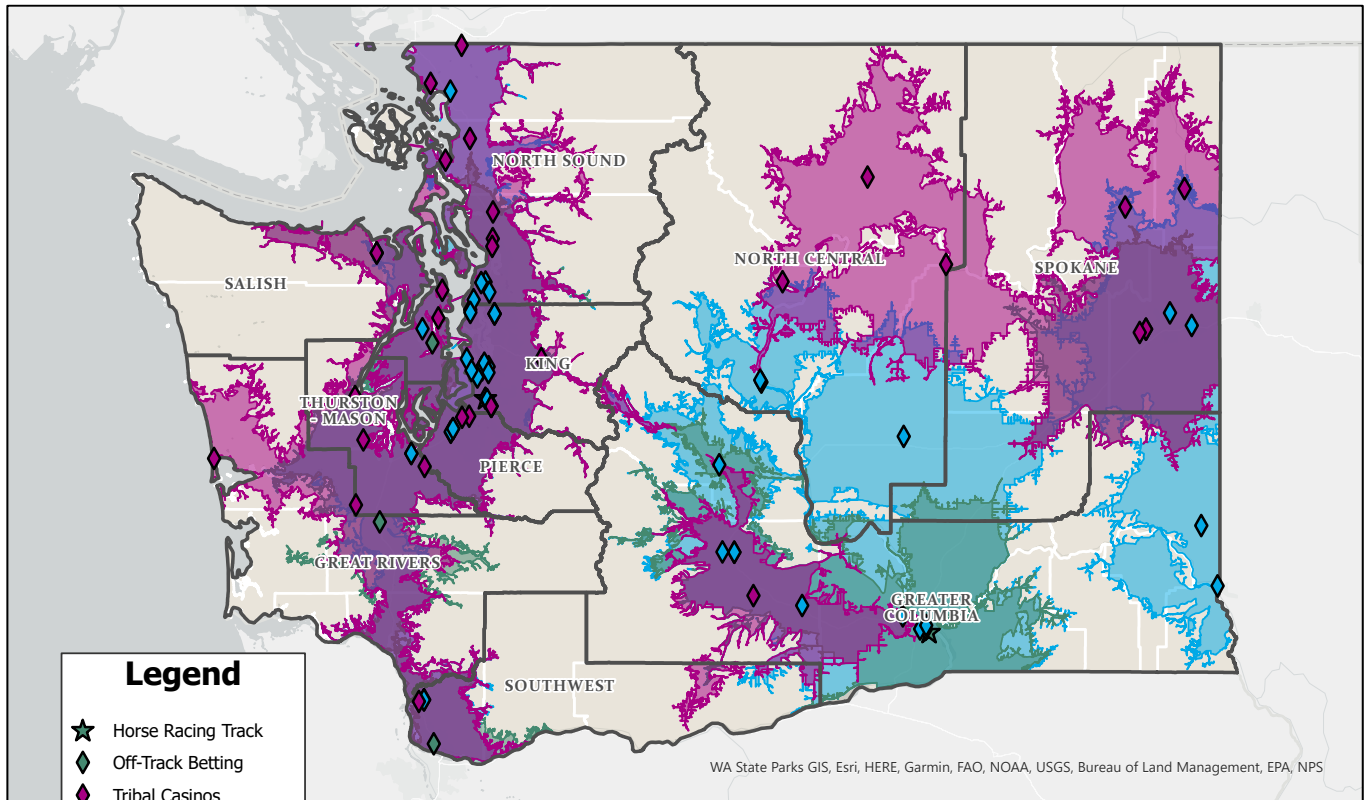


**Figure A Notes**

- \* HCA Ten Regional Service Areas map was re-created to match the GIS-generated versions for this analysis, no change to region boundaries. (See Endnote 15)
- \* Overlaps of locations and one-hour drive times overlap in many cases
- \* TBHC PO Box = Tribal Behavioral Health Center that has a PO Box as location
- \* TBHC Tribal Clients only = Tribal Behavioral Health agency that accept only Tribal members
- \* Certified Counselor = location of Certified Gambling Counselors
- \* Certified Telehealth only = Certified Gambling Counselors providing telehealth only
- \* Certified Tribal members only = Tribal BH agency with Certified Gambling Counselor and only accepts Tribal members
- \* Double Coverage = Overlapping one-hour drive times (e.g., Certified Gambling Counselor and Tribal BH agency)
- \* Certified Gambling Coverage = Location and one-hour drive times for only Certified Gambling Counselor



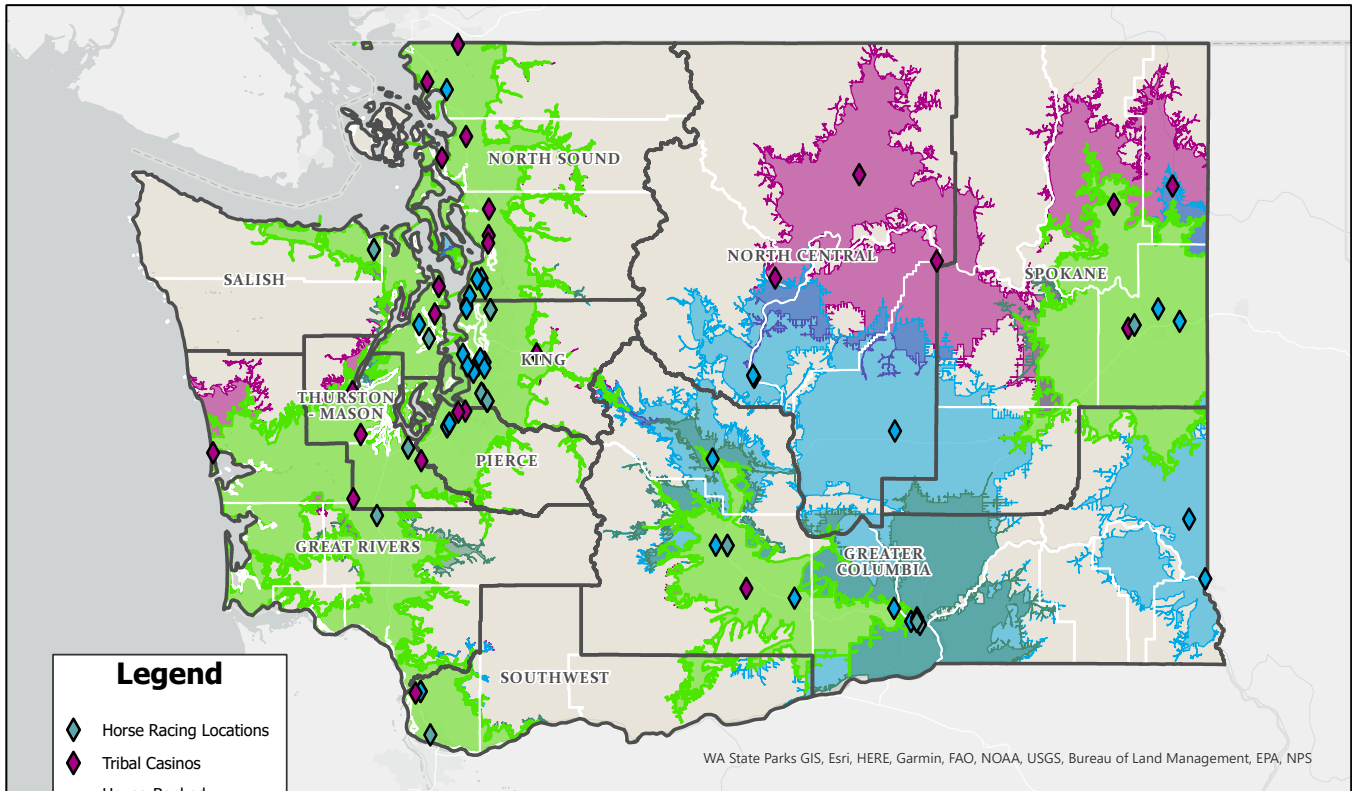
**Figure B:** Horse Racing, House-Banked Card Rooms & Tribal Casino Drive Times



**Figure B Notes**

- \* Overlaps of locations and one-hour drive times overlap in many cases
- \* Dark pink diamond = Tribal Casino
- \* Blue diamond = commercial house-banked card room
- \* Blue Star = horse racing track and dark green diamond indicates off-track betting location
- \* Areas covered by pink (Tribal Casinos), light blue (commercial house-banked card rooms), and teal (horse racetracks/off-site betting) are within one-hour drive time, with overlapping one-hour drive time indicated by the overlay of combined colors.
- \* Areas without color (grey) fall outside of the one-hour drive time limit.

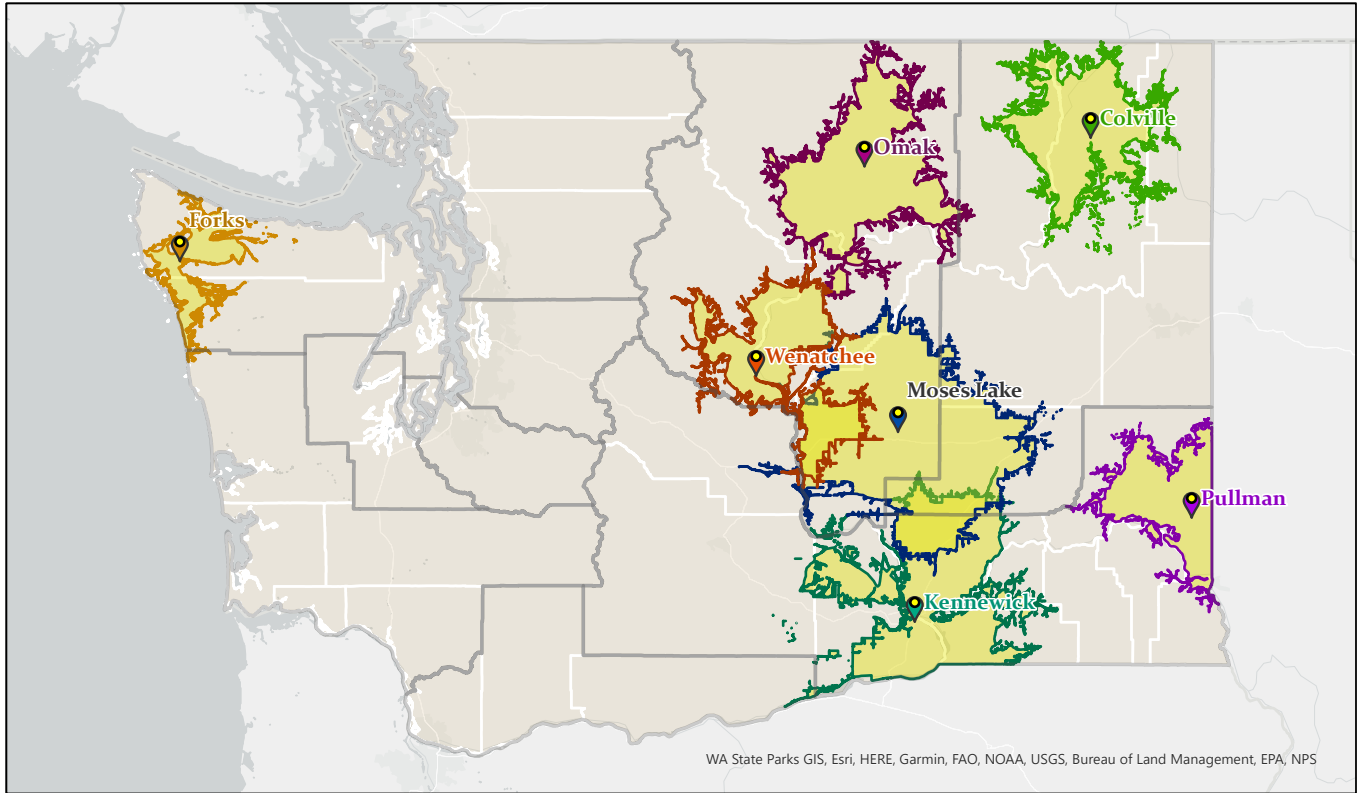
**Figure C:** Gambling Type Overlapping with Certified Gambling Counselor One-Hour Drive Times





**Figure C Notes**

- \* DOH-licensed problem gambling agencies are required to employ a Certified Gambling Counselor; therefore, those agencies are in the same place on this map as the corresponding gambling counselor.
- \* This includes both Tribal and non-Tribal DOH-certified problem gambling agencies.
- \* Areas not included in the light green coverage areas may have a Tribal behavioral health clinic that does not employ a Certified Gambling Counselor but does offer problem gambling treatment as indicated on their website.

**Figure D:** Proposed Certified Gambling Counselors  
(locations for focused recruitment)



### Legend

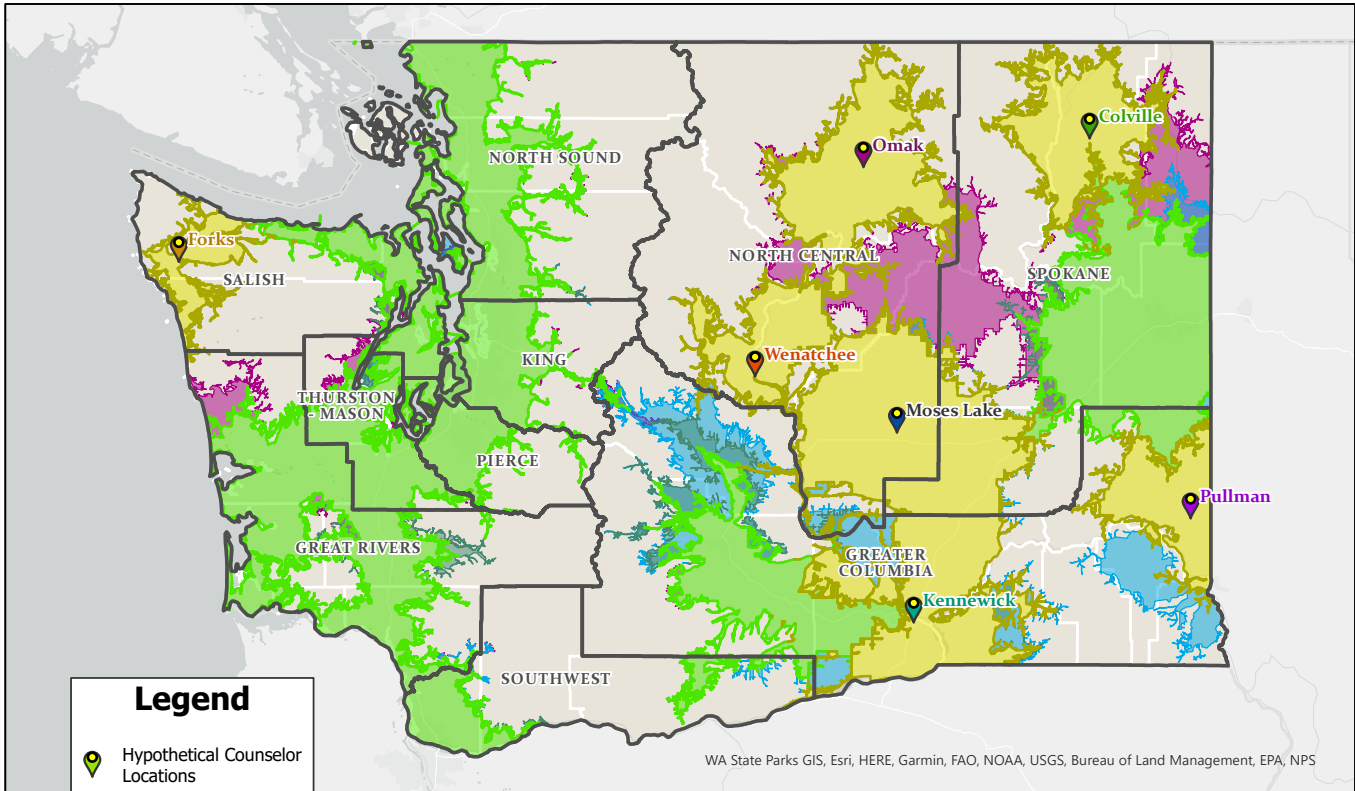
-  Labeled Hypothetical Counselor Locations
-  Hypothetical 1-hour drive time

### Figure D Notes

- \* Areas included on this map that need recruitment for Certified Gambling Counselors: Omak/Okanogan, Wenatchee, Moses Lake/Ephrata, Colville, Pullman, Tri-Cities (Kennewick, Pasco, Richland), Forks.
- \* Other areas under consideration not shown on this map are Clarkston-Lewiston, as well as regions or population centers that only have one Certified Gambling Counselor agency.
- \* Most of the identified areas are on the eastern side of the Cascades.
- \* North Central region has no Certified Gambling Counselors or DOH-certified problem gambling agencies.



**Figure E:** State Coverage with Proposed New Certified Gambling Counselors



**Figure E Notes**

- \* Pink, light blue, and teal areas have gambling activity that is outside the one-hour drive time to a Certified Gambling Counselor.
- \* Areas with no color (grey) have no gambling activity nor Certified Gambling Counselor within one hour.
- \* North Central region coverage will increase from 0 percent to over 90 percent.
- \* Greater Columbia region coverage will increase from 50 percent to 90 percent.
- \* Spokane region coverage will increase from 90 percent to over 96 percent.

## Need for Increased Funding to Expand Treatment Service

- **Existing gap in funding for treatment:** Since 2019, the State Program treatment budget has been experiencing an ongoing treatment budget gap of \$100,000 to \$150,000 in each of the last two biennial program budgets (2019-2021 and 2021-2023). The gap is created by the pressure of increased community demand for treatment services on HCA-contracted problem gambling treatment providers, which translates into these contracted providers requesting more funding from the State Program to meet this increased demand for services. The State Program Manager has been able to gather funding to close the treatment gap each budget period, but this is not a long-term, sustainable solution.<sup>27</sup>
- **Expanding access to state-funded problem gambling treatment:** The State Program is, unfortunately, not contracted with all state-certified problem gambling treatment providers. The lack of funding for treatment is the largest barrier to offering new contracts.<sup>28</sup> A long-term goal of the State Program Manager is to contract with more of the state-certified problem gambling treatment provider agencies and sole providers. And as the Certified Gambling Counselor workforce grows over the next 3 to 5 years, the State Program will be eager to contract with these new providers and agencies, especially in unserved and underserved areas of the state. The State Program needs more funding for treatment to be able to expand access to state-funded problem gambling treatment.<sup>29, 30</sup>

## Legislature's Role in Funding for State Problem Gambling Program

Since 2005 when the State Program began, ongoing funding for the program has come from a small percentage of both a business and occupations tax on commercial gambling including horse racing and other games of chance, and a percentage of sales from the Lottery. Because the funding is statutory in nature, to make any changes the Legislature would need to address the amount of funding directed to the state problem gambling account (which, through appropriation, funds the State Problem Gambling Program).

The PGTF has identified several options that legislators might wish to consider: 1) increasing the existing contribution rate for one or more types of commercial gambling activities; 2) designating general state funds; 3) another mechanism yet to be determined; and 4) adopting a multi-pronged approach in which funding would be tied to both the amount of commercial and non-profit gambling (as it is now) and a specific set amount from general state funds. The advantage of the multi-pronged approach for funding tied to the amount would continue to reflect funding for services based on the amount of commercial gambling, while also protecting the State Program budget from the ups and downs of the gambling environment (such as when all land-based gambling except for the Lottery ceased for several months during the pandemic).<sup>31</sup>

## Recovery Support Services

As defined by the federal government:

*“(Recovery is) a process of change through which individuals improve their health and wellness, live a self-directed life, and strive to reach their full potential.”<sup>32</sup>*

On the whole, most recovery services focus on individuals successfully transitioning from treatment back into everyday life and may include some combination of peer support groups along with supportive housing and supportive employment. In most cases, due to the overlap with other behavioral health disorders, individuals in recovery from problem gambling can access services based on a co-occurring disorder(s).

Despite the broad range of recovery support programs and services available across the state, very few specifically offer support to individuals recovering from gambling disorders. A very few recovery support organizations have sought to create an inclusive recovery environment that specifically includes individuals in recovery from problem gambling. The Recovery Cafe Network has incorporated this approach. (Appendix C: Recovery Support Services in WA State)

## Geographic Distribution

As with Certified Gambling Counselors, most peer recovery support service organizations are located west of the Cascades, with those on the eastern side mostly located in Spokane. The following categories of Recovery Support highlight the different types of services that people in recovery may be able to access, depending on geographic location and eligibility (when applicable). Only a handful of recovery support services identify a specific focus on gambling or problem gambling.

- **Peer recovery support organizations** are designed and delivered by people in recovery. Examples include Recovery Cafés, Peer WA locations, and individual organizations like Consumer Voices Are Born. Local chapters of national organizations such as Gamblers Anonymous and Gam-Anon (for loved ones) can be found both in some areas and as online support groups.
- **Tribal recovery support** is provided by most Tribal behavioral health agencies and frequently take a holistic, wrap-around approach that focuses on the whole person rather than on the presenting problem. In addition, the Northwest Indian Treatment Center (NWITC) has a recovery support team that provides aftercare planning.<sup>33</sup>
- **Related recovery support** includes those individual behavioral health agencies that have programs and/or staff that specifically focus on recovery after treatment. Also included is the WA Recovery Alliance (WRA), which has nine local recovery coalitions across the state led by individuals in recovery, families impacted by behavioral health conditions, and community organizations. WRA works to advance recovery by changing public understanding and shaping pro-recovery public policy.<sup>34</sup>
- **State recovery support resources** include the Washington State Recovery Help Line (1-866-789-1511), Certified Peer Counselors and Recovery Coaches, Recovery Housing (including 45 Oxford Houses and 347 Recovery Residences), Foundational Community Supports (jobs/housing/living) and Coordinated Entry Sites for families and adults experiencing homelessness.<sup>35, 36</sup>

## Identified Gaps in Recovery Support Services

- Lack of geographic availability in areas other than along the I-5 corridor.
- Lack of focus on problem gambling specifically. Few of the resources above focus on problem gambling as an area of service or peer support. Outreach to the other organizations listed (as well as additional recovery services not included here) is needed to gain clarity about whether their scope of work includes an awareness of problem gambling and the challenges to recovery.
- Lack of services for family and others impacted by loved one who gambles
- Lack of services that are culturally diverse, specific/relevant, and offered in languages other than English.

## Existing Problem Gambling Services in Federal Government and Other States

### Problem Gambling Services and the Federal Government

The Federal government does not provide any funding for problem gambling services. There is no federal funding (including Medicaid and Medicare) for problem gambling treatment, prevention, clinical training, awareness, outreach, education, or research. In addition, states cannot access any funding for problem gambling from the mental health block grant, substance use block grant, federal block grant, or emergency block grants (to mitigate impacts of COVID-19, for example). There have been Congressional attempts (and a current effort) to include problem gambling under the umbrella of behavioral health on the federal level, but to date, this has been unsuccessful.

## Problem Gambling Services in Other U.S. States – Funding Mechanisms

Because there is no federal funding or programs for problem gambling, each state must decide if it wants to invest in problem gambling services at all. About 42 states provide problem gambling services at some level, but each state's program is unique to its gambling and funding environment.<sup>37</sup> These are the most typical funding mechanisms:<sup>38</sup>

- Provide a portion of either gross or net gambling revenue (may be on specific gambling activities, such as Lottery, commercial gambling, or a subset or combination)
- Set a specific contribution amount from Lottery (such as 2 percent of gross receipts)
- Include a general state funds line-item for problem gambling
- Designate a portion of Tribal revenue from gambling revenue to be deposited directly into state fund designated for problem gambling (negotiated by compact)

## Problem Gambling Services in Other U.S. States – Services Provided

Along with the great variety of funding mechanisms used by U.S. States, state problem gambling programs also have a wide range of services that they offer. In Washington State, 70 percent of the State Program budget is allocated for treatment services; by contrast, in 2021, Pennsylvania spent 63 percent of its problem gambling budget on prevention and awareness projects and services, with only 9 percent spent on treatment.<sup>39</sup>

## 2 | Gap Analysis: Problem Gambling Services

The following table shows the main categories of services with the number of state programs that offer that service.<sup>40, 41</sup>

Problem Gambling Services Provided in other U.S. States		
Service Provided	Number of States	Percent (of 42 states with state PG programs)
<b>Problem Gambling Helpline Number</b>	<b>36</b>	<b>86*</b>
<b>Public Awareness</b>	<b>36</b>	<b>86**</b>
<b>Treatment</b>	<b>34</b>	<b>81**</b>
<b>Counselor Training</b>	<b>31</b>	<b>74**</b>
<b>Prevention</b>	<b>27</b>	<b>64**</b>
<b>Counselor Certification</b>	<b>12</b>	<b>29*</b>
<b>Program Evaluation</b>	<b>18</b>	<b>43</b>
<b>Research</b>	<b>17</b>	<b>41</b>

(\*) available in Washington State but not funded by State Program  
 (\*\*) at least partially funded in Washington State as a regular budget line item through State Program (see End Note #41)

### Extent of Need in Washington State

The 2021 Prevalence Study estimates that between 66,000 and 108,000 adults in Washington State are at moderate-to-severe risk for problem gambling, with an average of 90,000 individuals. Based on existing research, approximately 1 in 10 may seek services, for a total of 9,000 individuals.<sup>42, 43</sup>

- Currently, the State Program at HCA/DBHR provides treatment reimbursement for 300-400 clients annually through contracts with DOH-certified problem gambling agencies and sole providers, at an average cost of \$1,472 in fiscal year 2021.

- As discussed above, additional Certified Gambling Counselors are needed across the state in regionally identified areas.
- The State Program has experienced treatment funding gaps of approximately \$150,000 in the 2019-2021 and 2021-2023 budget periods.
- Collectively, Tribes contribute a minimum of \$3-4 million towards problem gambling services (based on amounts reported by Tribes to the Gambling Commission). Some Tribes are known to spend more than the minimum reported.<sup>44</sup>
- Behavioral health agencies that provide problem gambling services but are not contracted with the State Program are not required to report any information about the number and type of problem gambling services provided (number of clients served, overall spending on treatment, outcomes, or average per client costs).

The gap analysis clearly demonstrates the myriad needs in the problem gambling space. The recommendations, strategies, and considerations that follow are crafted to address these needs. Problem gambling is a behavioral health issue that stands outside mainstream behavioral health services. It is past time to remedy that situation and offer Washington State residents a complete suite of problem gambling services, especially in a time where the access and availability of gambling is so prominent and poised to increase even further.



## Key Data Sources

### Gap Analysis

To complete the gap analysis, these data sources were referenced:

- 2021 Washington State Adult Problem Gambling Prevalence Study (HCA)<sup>45</sup>
- 2021 Washington State Healthy Youth Survey (DOH/OSPI/HCA)<sup>46</sup>
- Roster of Certified Gambling Counselors (WSCGC-I/II, ICGC-I/II) and locations in Washington State (ECPG)<sup>47</sup>
- Land-based gambling locations (excluding Lottery point-of-sale)<sup>48</sup>
- 2021 State of the States Report (NAADGS)<sup>49</sup>
- American Community Survey data (based on 2020 Census)<sup>50</sup>
- Washington state agencies (websites, including online data sources, materials, and staff)<sup>51</sup>
- ECPG website and materials<sup>52</sup>
- WIGA Responsible Gaming website
- Other jurisdictions' Problem Gambling Program websites, materials, and staff interviews
- Related research studies, reports, fact sheets

### Limitations

The lack of publicly accessible anonymized datasets that include all problem gambling services provided by all entities within the geographic boundaries of Washington State (including Tribal lands) hindered the Task Force from conducting a comprehensive gap analysis for the entire state. Only HCA-contracted problem gambling treatment agencies and sole providers are required to submit data in TARGET2000, the current Invoicing and Clinical Treatment Tracking Database. There is no requirement in Washington State that non-contracted problem gambling entities, including public agencies, sole providers, Tribal behavioral health agencies, and private agencies must submit data on their problem gambling services into one database. Medicaid doesn't currently cover problem gambling treatment (so this data isn't collected in Provider One). Therefore, this gap analysis has focused mostly on the services provided by the State Program, with additional information added about services provided by other entities whenever possible and readily available.

Additional limitations included the small number of staff available to do significant, in-depth research in time to meet the deadlines for the 2021 Prevalence Study final report and then final PGTF recommendations report to the Legislature.

# 3 | Problem Gambling Task Force Recommendations

The Problem Gambling Task Force recommendations are placed in three topical categories: (I) Comprehensive Problem Gambling Services, (II) Necessary Infrastructure, and (III) Collaboration and Partnerships.

## I. COMPREHENSIVE PROBLEM GAMBLING SERVICES

Improve availability and access to all levels of treatment and recovery support services for problem gambling.

Problem gambling treatment and recovery support services are a vital element of the state's behavioral health services but are underfunded and need to be expanded.

State-funded problem gambling services are not easily accessible across all regions, including in some areas where consumers are near one or more gambling opportunities (e.g., commercial card rooms, Tribal casinos, and other gambling).

A study conducted in 2016 and administered to U.S. adults showed that proximity and access to gambling appears to be correlated to problem gambling, depending upon specific factors that include distance to and type of gambling activity. Some areas of WA State offer gambling within a one-hour drive, but do not have a

Certified Gambling Counselor within a one-hour drive. Expanding the availability of state-funded problem gambling treatment along with access to both residential and outpatient treatment is a major priority of the PGTF.<sup>53</sup>

The Washington State Gambling Counselor Certification Committee (WSGCCC) continues to work to reduce unnecessary barriers while maintaining high standards to expand the Certified Gambling Counselor workforce.

### Proposed Strategies

- Convene a stakeholder workgroup to determine if private insurers are, in fact, covering problem gambling treatment. This would likely be initiated by the Washington State Legislature.
- Expand use of resources beyond clinical counseling, for example, Certified Recovery Coaches, Certified Peer Coaches, and Peer Support Specialists. This would likely be initiated by HCA/DBHR and ECPG.
- Allow and provide funding for residential problem gambling treatment in state and out-of-state.<sup>54</sup> This would likely be initiated by the Washington State Legislature, HCA/DBHR, and other state agencies as needed.
- Increase number of Certified Gambling Counselors in parts of the state that don't have problem gambling treatment services available within one hour drive time. This would likely be initiated by HCA/DBHR and ECPG. (Appendix B: Availability of Gambling & Problem Gambling Treatment in WA State – GIS Maps)

Integrate problem gambling awareness, prevention, education, outreach, treatment, and recovery support services into behavioral health and substance use disorder programs.

Despite being housed within the Washington State Health Care Authority Division of Behavioral Health and Recovery (HCA/DBHR), problem gambling services are not integrated with other mental health and substance use disorder services. Since the initiation of the State Program in 2005, the lack of any federal funding for problem gambling services has led to the State Program services not being included in the ongoing integration of behavioral health services. Administratively, this has also siloed the State Program from all other behavioral health prevention, treatment services, recovery services, and clinical training.<sup>55</sup>

Funding for the State Program is at about the same level in 2022 as it was in 2005, despite the rapidly changing gambling landscape over the past decade.<sup>56</sup>

Washington State has seen significant growth in population which translates to more people gambling. Analysis based on the 2021 Washington State Adult Problem Gambling Prevalence Study demonstrates that the need exists to significantly increase treatment services. Better integration within the behavioral health systems would help meet the clear needs in problem gambling services.

Currently in Washington State, very few behavioral health agencies screen clients for problem gambling despite that numerous research studies have shown that there is significant overlap between problem gambling and co-occurring disorders (mental health-related and/or substance use disorder). These are missed opportunities for clients to receive integrated treatment for both problem gambling and one or more co-occurring disorders.<sup>57</sup>

In addition, studies have shown that youth and young adults have a higher risk for problem gambling than adults (6.3 percent versus 3.5 percent in Washington State). However, prevention activities focused on problem gambling are not integrated with other state-level prevention activities. This is another missed opportunity to coordinate prevention initiatives on problem gambling with other topics, like alcohol and substance use, smoking, and other risky behaviors.

### **Proposed Strategies**

- Significantly increase state funding for problem gambling prevention activities. This would likely be initiated by the Washington State Legislature.
- Initiate grant-based funding project for behavioral health agencies to voluntarily integrate a short evidenced-based/validated problem gambling screening tool with mental health and substance use disorder assessment processes. This would likely be initiated by HCA/DBHR.<sup>58</sup>
- Surface and share the experience and success of our state and Tribal partners in this arena.
- Enable HCA/DBHR to integrate problem gambling with other behavioral health care services. This would likely be initiated by the Washington State Legislature and implemented by HCA/DBHR.



Integrate problem gambling information into clinical behavioral health curriculum, training, and counseling programs.

Information about problem gambling screening, assessment, referral, and treatment is not currently included or required for mental health and substance use disorder training programs in Washington State, including undergraduate and graduate level clinical degree programs. Washington State behavioral health clinicians should be aware of the impacts of problem gambling, how individuals and those around them are impacted, and how to access problem gambling treatment and recovery services.

### Proposed Strategies

- Require existing and future clinical training programs for substance use disorder and behavioral health professionals to include problem gambling as a required topic for example, the new University of Washington (UW) Behavioral Health Teaching Facility under development. This would likely be initiated by the Washington State Legislature, HCA/DBHR, and UW.
- Include information within all behavioral health clinical training programs and behavioral health-related higher education degree programs about how treatment and recovery are approached and how to become a Certified Gambling Counselor. This would likely be initiated by the Washington State Legislature, HCA/DBHR, and ECPG.
- Create opportunities to share the experience and success of our state and Tribal partners, likely be initiated by HCA/DBHR.

Enhance consumer protections and responsible gaming for vendors, operators, and the public, including youth.

Despite the known impacts from problem gambling and gambling disorder, the protections for consumers from the mechanisms of addiction need to be strengthened and expanded in Washington State. Prevention and consumer protections are especially important to have in place for people under 18.<sup>59</sup>

A related topic of concern is the need to improve responsible gaming messaging focused on adult consumers. As an example, in Washington State, clear messaging is required on every pack of cigarettes (warning label); every ad for alcoholic beverages (responsible drinking/legal age/don't drink & drive messages); and every cannabis distributor billboard has a disclaimer that products are for ages 21 and over. State law requires that land-based gambling establishments post signage about responsible gaming, the Problem Gambling Helpline, and other resources.<sup>60</sup>

Despite these state requirements for land-based gambling, the PGTF has determined that Washington State should take a more active approach on behalf of consumers to raise the bar on expectations for responsible gaming.

### Proposed Strategies

- Determine and decide which state agency will take the lead role in advancing consumer protections for existing and newly legalized gambling activities in the future. The approach would likely involve WSGC, HCA/DBHR, the WA State Attorney General's Office, and other partners.

- Incorporate responsible gambling education for players in brick-and-mortar vendors and operators, including odds/stats, common distortions, and problem gambling resources. Examples of common thought distortions are thinking ‘this machine is hot and will pay out’, ‘this machine just paid out so I won’t win again today,’ general superstitions about luck, lucky charms, rabbits feet, and ‘I should play these lucky numbers because X-Y-Z happened today.’ This would likely be initiated by ECPG, WSGC, and HCA/DBHR.
- Develop and distribute a mobile app that can be used by consumers to locate problem gambling services, including prevention, treatment, and recovery referrals and other resources. This would likely be initiated by ECPG and HCA/DBHR.
- Support enhanced problem gambling prevention services for youth (under age 18) that are integrated into existing HCA prevention efforts. This would likely be initiated by HCA/DBHR.
- Washington State Gambling Commission will identify a staff position within the agency to be a resource person for staff and Commissioners on responsible gambling. This would likely be initiated by WSGC.
- When legislators or state executive branch agencies consider expansion of gambling and/or any change to gambling law or statute, a policy analysis should be completed by legislative or agency staff that assesses the impact of the expansion or change on the need for expanding state-funded problem gambling services.<sup>61</sup>

## Recognize impacts of internet use and gaming disorders on youth and adults.

Washington State government doesn’t currently fund specialized clinical treatment services for individuals negatively impacted by online video gaming and/or internet disorders. The World Health Organization (WHO) recognizes gaming disorder; however, the Diagnostic and Statistical Manual of Mental Disorders, Fifth Edition (DSM-5) does not currently recognize it. The DSM-5 does propose internet gaming disorder for future inclusion. This leaves an unmet need for treatment for online gaming/internet disorders that the State Program could meet if its scope of responsibility were to be expanded. See Chapter 6: Looking Ahead: Areas of Interest and Concern for more.

### Proposed Strategies

- Legislature to convene and engage a statewide stakeholder group to consider these initial issues:
  - » Study internet gaming, video gaming with gambling elements, and casino-style mobile gaming.
  - » Consider enacting consumer protections requiring that third-party vendors provide the ability to track time and money (if applicable) played, block oneself from play for a period of time, not receive promotional emails or texts, and not market to children. Remain open to other protections that may be required as the technology develops and as problems reveal themselves.
  - » Clarify definition of “thing of value” in gambling statutes beyond a monetary/tangible good to include time, energy or similar investment. Clarify that real

money spent to gain digital money or goods used for in-game gambling and online video gaming is gambling.

- » Assess if the state should make further investment into outreach towards parents, educators, and community members who interact with children and young adults, as well as the video game and entertainment industry in Washington State.
- » Amend RCW 41.05.750, which governs the State Program, to expand its scope to fund reimbursement services for individuals with diagnosed gaming disorder (as the state currently does with problem gambling).
- Legislature to change scope of responsibility in WAC/RCW(s) to allow the State Program (HCA/DBHR) to fund reimbursement services for individuals with diagnosed online gaming/internet disorder (as it currently does with problem gambling).

## Assess the potential of including a gambling treatment diversion program within existing Washington State courts.

Therapeutic Justice Courts, diversionary courts, and specialty courts are part of a concept developed over the last 30 years. This concept has changed the focus of the criminal justice system. Instead of the practice of cycling individuals in and out of the system, gambling treatment diversion gives them an opportunity for productive growth.

Gambling treatment diversion works on the same premise as the long-standing drug and family courts, relying on a system of sanctions and rewards to keep participants on track. In the standard practice of traditional courts, when participants fail to comply with program regulations, the judge usually imposes sanctions ranging from frequent court appearances to jail time. In contrast, with gambling treatment diversion, progress is rewarded by recognition from the bench during court visits, reduced supervision, and less frequent court appearances.

### **Benefits of Therapeutic Justice Programs for those Impacted by Gambling Disorder<sup>62</sup>**

- Participants in treatment can maintain employment, which increases likelihood of making financial restitution.
- Treatment recognizes restitution and financial accountability as essential goals of treatment.
- Treatment addresses family needs along with the participant.
- Participants can use supportive resources that would not be available in jail, such as Gamblers Anonymous and family support.
- Participants are often highly motivated to engage in and complete treatment to avoid negative consequences
- Positive consequence of having criminal record sealed provides additional motivation to succeed.
- Successful outcomes reduce social costs to the community and relieve future burden on courts.

The PGTF understands the importance of adding a gambling treatment diversion program within existing diversion courts. During 2012 to 2017, ECPG worked in partnership with the Pierce County Superior Court Drug Court and Family Court Programs and Pierce County Alliance to offer a Problem Gambling Track as part of the Therapeutic Justice programs. This program was supported by the Department of Justice, Lakewood City Police, and the Puyallup Tribe of Indians. The greatest challenge to its long-term continuation proved to be the reason for the program's demise – the inability to keep Certified Gambling Counselors on the staff at Pierce County Alliance, the sole treatment provider agency contracted with Pierce County Superior Court Drug and Family Courts.

When this innovative program launched in Washington State in 2012, there was only one other similar program in the country. Today there are approximately 3,700 Drug Courts across the United States, but only one Gambling Treatment Diversion Court program, located in Nevada. As of this writing, Ohio and New Jersey are exploring adding gambling treatment diversion courts.<sup>63, 64</sup>

### **Proposed Strategy**

Legislature to convene a work group made up of representatives from nonprofit problem gambling organizations, treatment providers and agencies, state agencies, the Office of the Administrator for the Courts, Superior Court judges and attorneys in Drug and Family Courts, law enforcement, Tribes, and the recovery community to consider the effectiveness and provide guidance on the implementation of a gambling treatment diversion program in Washington State.

## **II. NECESSARY INFRASTRUCTURE**

Increase state funding for the State Problem Gambling Program to meet current and future needs.

As presented in Chapter 2: Problem Gambling Services Gap Analysis, the PGTF identified a need to increase access to problem gambling prevention, treatment, recovery support, and other services offered by the State Program. Expanding access to services will require additional state funding for the State Program. The number of Certified Gambling Counselor must also be expanded by a minimum of 25 percent, and possibly more, to meet current and future anticipated need.<sup>65</sup>

### **Current State Problem Gambling Program Funding**

The State Program's clinical treatment reimbursement program was launched in 2005, with funding from Tribes and the state as a low-barrier program to bridge the gap for individuals not insured, or under-insured, for problem gambling/gambling disorder treatment. The State Program is funded by appropriation from the state problem gambling account.<sup>66</sup> Funds flowing into the state problem gambling account come from a business and occupation tax (0.13 percent) on net revenues above \$50,000 annually from commercial, charity, and non-profit gambling.<sup>67</sup> The Lottery also contributes at the same rate (0.13 percent) based on net sales receipts.<sup>68</sup>

The 2021-2023 State Program appropriation is \$1.463 million, with an additional \$150,000 appropriated in the 2022 Supplemental Operating Budget to close the gap for treatment funding in the current State Program budget.<sup>69</sup>

Additional funds have come from Tribes, and non-profit organizations have donated to the State Program over the years. As of May 2022, at least 70 percent of forfeited funds from commercial house-banked card rooms collected due to the Statewide Voluntary Self-Exclusion Program (VEP) are also being deposited into the problem gambling account.<sup>70</sup> In the first six months since the VEP opened, forfeited funds have averaged around \$1,000 per month.

Currently, there is either no funding or inadequate funding for critical components of a comprehensive state-funded problem gambling program across the range of services, including prevention, treatment, recovery support, clinical training, outreach/ education/ awareness, program monitoring and evaluation, and research.<sup>71</sup>

#### Proposed Strategies

- Legislature to increase funding for the state problem gambling account from \$1.463 million in the 2021-2023 biennium to \$2.8 million in the 2023-2025 biennium.<sup>72</sup> (Appendix A: Current & Proposed Budget Models – WA State Problem Gambling Program) This will require that the Legislature do the following:
  - » Determine mechanism(s) and enact increase of funds deposited into the state problem gambling account created by RCW 41.05.751; and
  - » Increase the spending authority (appropriation) to the State Program by the same amount.

- Legislature to consider diverse funding sources for the State Program when determining the mechanisms and sources used to increase funding (e.g., state problem gambling account and general fund state).

#### Implement a new data system for the State Problem Gambling Program.

Since 2005, the State Program has been using the TARGET2000 data system. Contracted problem gambling agencies and sole providers are required to enter client, assessment, and encounter data for all treatment services provided. At Department of Health and Human Services (DSHS), when TARGET2000 was rolled out over two decades ago, many of the behavioral health services utilized TARGET2000.

Over the years and continuing with the move of DBHR to HCA in July 2018, all other remaining behavioral health services were migrated into other data systems. Except for a few Tribal behavioral health agencies that have historically used TARGET2000 to track their own clients and encounters, the State Program is the only state program that still uses TARGET2000. TARGET2000 is no longer supported by the vendor, and only minimally supported on a case-by-case basis by HCA's IT unit.



In the 20 plus years since TARGET2000 was implemented, program evaluation and monitoring has moved away from proxy measures of success to actual quality of life measures of success, data fields not obtainable with TARGET2000. Many other state and national problem gambling programs have already transitioned to new data systems over the past 5-10 years that, by design, have both flexibility and a focus on real measurable outcomes, not simply proxy measures.<sup>73</sup>

### **Proposed Strategies**

- HCA to procure a new data system that offers:
  - » Flexibility to adapt to changing needs (e.g. ability to track telehealth during pandemic);
  - » Easy and accessible reporting on progress and outcome measures, such as quality-of-life for program evaluation and monitoring; and
  - » Migration of data from existing TARGET2000 to new system.
- HCA to seek input from staff, clinicians, and other end-users when exploring options for a new data system, and will include the State Program in the specification, design, and implementation processes.

### **III. COLLABORATION AND PARTNERSHIPS**

The Governor, the Washington State Gambling Commission, and the Washington State Health Care Authority should work collaboratively with the state legislature, Tribal governments, relevant state agencies, and key stakeholders to determine funding and service strategies to best meet the needs of Washington State residents.

The 2021 statewide prevalence study on problem gambling, commissioned by the Washington State Health Care Authority, has shed empirical light on the overall need for Washington State residents to have access to comprehensive problem gambling services. Chapter 2: Problem Gambling Services: Gap Analysis delves into this issue in greater detail.

#### **Proposed Strategy**

With the sunset of this legislative task force there will no longer be an organized space for conversations in the problem gambling space. This recommendation calls on the key parts of state and Tribal governments to continue dialogue and proposing recommendations to support comprehensive problem gambling services for all our residents. This would likely be initiated by the WSGC and HCA/DBHR, in collaboration with ECPG, Tribal governments, state legislature, and state agency partners.

## 4 | Early Success: Problem Gambling Initiatives Completed or In Progress

### INITIATIVES COMPLETED

In the two years since the Problem Gambling Task Force launched, various agencies, Tribes, and other organizations within Washington State have made important strides toward improving awareness and access to problem gambling prevention, treatment, and recovery services. The following initiatives compliment many of the Task Force recommendations and underscore the breadth of unmet need in Washington State.

#### **Completed: Require Responsible Gaming training for all commercial venue staff.**

Most people can enjoy gambling for recreation and entertainment. For some, however, gambling can become a problem. With more and more individuals enjoying gambling as entertainment in casinos and other gaming venues, it's crucial that commercial gambling operators be required to provide information and education about gambling addiction, prevention, and treatment services. This need highlights the importance of robust responsible gaming programs and policies.<sup>74,75</sup>

A Responsible Gaming program that includes annual employee Responsible Gaming training is good customer service. The intent of an employee Responsible Gaming training program is to provide staff with a higher level of understanding and flexibility to assess if a customer is struggling to gamble responsibly and determine a course of action.

Based on evaluation of existing responsible gaming programs, these programs have been shown to be beneficial, but success rests on operators continuing to provide on-going education and refresher trainings.

Along with gambling venue customers, people who work at gambling venues (employees) are an important and under-researched group. According to the International Center for Responsible Gaming, many states and casino operators in the U.S. require gaming employees to go through training on the specifics of disordered gambling and responsible gaming.<sup>76</sup>

Research also supports the reasons to require Responsible Gaming training for gambling venue employees.<sup>77</sup> Employees are slightly more vulnerable to gambling disorders than the general public. Gambling industry employees can experience personal health risks, due to working in venues where gambling is part of their daily job. They also have direct contact with customers who might engage in multiple risky activities (e.g., drinking, smoking, and gambling) and might need assistance to facilitate help-seeking by patrons or co-workers who experience problems. Knowing the signs of problem gambling and where to turn for help for themselves, as well as others, is a crucial part of Responsible Gaming training.

#### **Actions Taken**

In 2022, the Washington State Gambling Commission approved new rules related to the initiation and operation of the Statewide Self-Exclusion Program.

Under the new rule, all operators of commercial card rooms must provide annual Responsible Gaming training for staff. This requirement is now in force.

In 2021, Washington's Lottery received verification as a responsible gambling organization at the Implementation Level from the North American Association of State and Provincial Lotteries and National Council on Problem Gambling.<sup>78</sup> The evaluation standards for this verification process require a robust employee and retailer education program, which has been implemented.

**Completed: PGTF to gain clarity and learn from the treatment and recovery support services offered by Tribal behavioral health agencies in Washington State.**

*Tribes in Washington State Support Responsible Gambling*

Tribes in Washington are working on multiple fronts to proactively address problem gambling. Tribes contribute more than \$3 million annually to support responsible gambling education, problem gambling prevention and treatment, and wellness. Addressing addiction is an evolving effort, and Tribes are committed to continual learning and refining their efforts to prevent and treat problem gambling. The work of the Tribes includes:

- Designing and implementing treatment programs for tribal and non-tribal members, including inpatient, intensive outpatient, outpatient, aftercare, group, and family care and intervention support.
- Funding problem gambling programs, including a significant portion of ECPG's budget.

- Supporting prevention and education through youth and elder programs, community talking circles, helpline signage, websites, posters, billboards, videos, advertising, financial education classes, community events, and partnerships.
- Training staff to build their capacity to recognize and address problem gambling.
- Designing culturally appropriate and community-based approaches to treatment.
- Providing counseling to address related topics such as money management, emotion regulation, cross addiction, and the impact of gambling on relationships.
- Forming the Intertribal Providers Coalition, where tribal problem gambling counselors meet monthly.
- Offering self-exclusion programs so guests with problem gambling behaviors can exclude themselves from a tribal gambling property.

### **Actions Taken**

#### *WIGA Awareness-Building Campaign*

The Washington Indian Gaming Association (WIGA) recently launched a paid media campaign to raise awareness and help those struggling with problem gambling. WIGA's annual paid digital and print media campaign is in its second year. Using audience and behavioral targeting, the campaign targets those who may have a gambling problem and those seeking help. Visually compelling ads and online resources at [WATribesCare.org](http://WATribesCare.org) let people know that they are not alone, and help is available. The campaign directs people to treatment, support and recovery resources offered locally and statewide. The 2022 campaign ran from March through April and garnered more than 3.7 million digital impressions and reached 600,000 via print.



**Completed: Establish statewide voluntary self-exclusion programs for commercial venues and lottery.**

Voluntary self-exclusion allows individuals to ban themselves from specific gambling activities and is a powerful evidence-based responsible gambling strategy. Individuals who enroll in voluntary self-exclusion are generally prohibited from collecting any winnings or promotional prizes, recovering any losses, or accepting complimentary gifts, services, or other things of value from a licensee or operator.

In Washington State, there several options for self-exclusion from gambling. Many Tribes offer voluntary self-exclusion at their casinos. In addition, there two state-sponsored voluntary self-exclusion programs available, one through Washington’s Lottery (Lottery) and the other through the Washington State Gambling Commission (WSGC).

**Actions Taken**

Since May 1, 2022, the new Statewide Voluntary Self-Exclusion Program established by the WSGC is in effect at all licensed house-banked card rooms. Tribal casinos are invited to join but are not subject to all the requirements that commercial card rooms must comply with.

As of this report, over 200 individuals have enrolled. Individuals can enroll via mail (with notary confirmation of identity), at the WSGC Lacey office, or at several house-banked card rooms located around the state. Individuals may ban themselves for a period of one, three, five, or ten years, at the end of which WSGC will contact the individual to let them know that the period is ending and that if they would like to be removed from the self-exclusion list, they must complete a form to be removed (opt-out).

If individuals who have signed up on the statewide Voluntary Self-Exclusion Program later attempt to collect winnings at a commercial house-banked card rooms, these funds will be forfeited, and a check for a minimum of 70 percent of the amount of the winnings is sent to the state problem gambling account, with any remaining funds distributed to a charitable or nonprofit organization that provides problem gambling services or increases awareness about problem gambling.<sup>79</sup>

The Lottery offers a voluntary self-exclusion program for people who play lottery games. WSGC offers a voluntary self-exclusion program for people who play in commercial house-banked card rooms. Tribal casinos may elect to be included by the WSGC program or may offer their own program (and many do).

The Lottery began offering a voluntary self-exclusion program on June 14, 2021. The program was announced broadly through the Lottery’s website, as well as social and traditional media. This program allows players to request to be excluded from lottery activities within the state of Washington for a predetermined length of time, and to be prohibited from collecting winnings over \$600 or any second chance drawing prize. Each person who enrolls in the program acknowledges that it is their responsibility to refrain from engaging in lottery play and other activities offered by Washington’s Lottery.

**Completed: Ensure that the Healthy Youth Survey permanently includes a two-part question about gambling and problem gambling.**

The Healthy Youth Survey (HYS) is conducted every other year by DOH, in collaboration with HCA.<sup>80</sup> Eighth, tenth, and twelfth graders are surveyed about many aspects of behavior, including substance use, mental health issues, and other related topics. Since 2006, the survey included one question about either gambling or problem gambling, except for 2018 (no question was included in that year's survey).

**Actions Taken**

The 2021 HYS included a two-part question at the request of HCA, for both gambling and problem gambling. As with adults, both prevalence rates are important to understand the full picture of the percentage of youth who gamble and the percentage that have self-identified with having issues with friends, family, or school, especially given that gambling is illegal for anyone under 18, except as defined under RCW.<sup>81</sup>

The data analysis of the 2021 HYS supports the importance of problem gambling prevention activities focused on youth, as well as parents, teachers, and other responsible adults. HCA determined that this two-part question is now categorized as a required question in all future surveys, with the next being in 2023.

*INITIATIVES IN PROGRESS*

**In Progress: Increase number of Certified Gambling Counselors in unserved and under-served regions.**

Prior to the convening of the PGTF in January 2020, the State Program and the WA State Gambling Counselor Certification Committee (WSGCCC) were already aware of several issues affecting the availability of Certified Gambling Counselors:<sup>82</sup>

- The likelihood that more Certified Gambling Counselors were needed, and mainly in the eastern and rural areas of the state (over 90 percent were along the I-5 corridor).
- The barriers to becoming a Certified Gambling Counselor needed to be reduced to encourage more licensed mental health providers and substance use disorder professionals to become certified.
- A problem gambling prevalence study had not been completed since 1998, so the estimate of the number of individuals at moderate-to-high risk for problem gambling was measured last in a different gambling environment over two decades before.

As of October 2022, DOH's clinician database indicates over 31,000 active behavioral health licenses (credentials).<sup>83, 84</sup> Despite the large number of behavioral health clinicians and substance use disorder professionals practicing within the state, there are only about 40 that are active Certified Gambling Counselors, with several more in training/provisional status.

Despite the increase in telehealth clinical appointments due to the pandemic, greater access to in-person treatment is still needed. Most Certified Gambling Counselors and

DOH-certified problem gambling agencies are located along the I-5 corridor, leaving large areas of the state without access to in-person state-certified problem gambling treatment in the area. The PGTF identified eleven geographic areas of the state that have no active Certified Gambling Counselors or DOH-certified problem gambling agencies within a one-hour drive time.

### Barriers Surfaced

- Lack of employer support for individual counselors to take time away from work to complete the required certification training.
- Staffing shortages that prevent the ability to provide caseload and group coverage for staff to take time away from work to complete the required training and supervision. Although an issue for all provider agencies, smaller agencies are particularly impacted by staffing shortages.
- Financial barriers such as application fee, exam fee, training expense which may require travel, hotel, meals, etc., clinical supervision, and a bi-annual renewal fee.
- Lack of diversity among the Certified Gambling Counselor workforce; only a handful are bilingual or multilingual and/or who provide culturally specific treatment services.
- Lack of Medicaid coverage for problem gambling treatment.

After extensive review of the data and consultation with the Washington State Gambling Counselor Certification Committee, the State Program, and ECPG, the PGTF recognized the need to increase both the number and the regional availability of Certified Gambling Counselors across our state.

### Initial Work to Date

- **Over the past several years, the WSGCCC has been focused on reducing barriers to certification**, with the overarching goal to lower barriers while keeping high standards.<sup>85</sup> This work is on-going, but here are a few examples of changes made already to the requirements for certification:
  - » Requirement that the candidate have at least three in-person sessions with a gambling counselor supervisor has been changed to allow for clinical supervision in person, by phone, or by HIPPA-compliant video/audio communications.<sup>86</sup> This also eliminates the need to travel across the state or to another state to receive in-person supervision.
  - » Simplification and clarification of licensures and educational combinations that can apply for provisional or final certification.
  - » Creation of a written case conceptualization exam as an alternative option that is more culturally relevant and Washington State-focused, as requested by some candidates.<sup>87</sup>
- **Through their contract, ECPG and the State Program have increased the daily lodging scholarship** amount and the overall number of scholarships, including awarding scholarships for online trainings that include a fee.
- **When the pandemic started, ECPG moved all trainings online**, including the Problem Gambling Core Training (30 hours) that is a requirement for certification. This has allowed many clinicians to attend who would otherwise not be able to due to a lack of travel funding and pandemic restrictions.

The 30-hour course is offered at least twice per year and is a hybrid of 10 hours of self-directed online learning and 20 hours of live learning. Since January 2021 and for the foreseeable future, in winter the 20-hour live-learning portion is offered virtually and in summer the 20-hour live-learning portion is offered in-person. ECPG continues to also offer many online trainings, including training the treatment of Gaming Disorder.

- **The State Program and ECPG are continuing to support and expand opportunities for online training** for clinicians, prevention specialists, peer counselors, behavioral health agency staff and leadership, and others with an interest in problem gambling services.
- **The State Program, ECPG, and WSGCCC are addressing unserved/under-served regions** in Washington State by identifying where Certified Gambling Counselors and DOH-certified problem gambling agencies need to be recruited.
- **The State Program, ECPG, and WSGCCC are focusing on expanding problem gambling treatment services to higher risk populations**, including populations with primary language other than English.
- **The State Program is pursuing approval for coverage of problem gambling/gambling disorder treatment under Medicaid.** CMS will determine HCA's role in this effort.<sup>88</sup>

### Activities contingent on additional funding for the State Program

- Offer 100 percent scholarships to provider agencies and clinicians in unserved/under-served regions and/or populations.
- Offer a maximum per diem funding option for agencies that are unable to cover daily cost of having clinician unavailable during training and related activities.
- Provide on-site mini-trainings at provider agencies to encourage participation in certification process (e.g., Community Based Health Clinics and Federally Qualified Health Centers).
- Offer problem gambling readiness grants that include certification of one or more employed clinicians with additional technical assistance to prepare the agency.

### In Progress: Increase reimbursement rates for state-contracted certified problem gambling agencies.

The State Program's rates for treatment, case management, and clinical supervision have been the same since before 2011. When treatment reimbursement rates fail to rise at the same pace as increases in market rates, behavioral health agencies and sole providers' interest in providing problem gambling treatment services declines. To keep problem gambling treatment as a viable option that agencies and individual providers will be able to continue to provide in our state, the State Program's problem gambling treatment reimbursement rates need to be increased.

Funding for the State Program is based on the appropriation from the dedicated state problem gambling account (RCW 41.05.751). Raising the appropriation from the state problem gambling account for problem gambling treatment is not a long-term solution.



From State Fiscal Year (SFY) 2020 to now, legislators have appropriated an additional \$650,000 for specific uses.<sup>89</sup> The appropriation amount has remained steady (within several thousands of dollars) over the past decade. Without an increase in funding coming into the state problem gambling account, the amount of unappropriated funds (rainy day funds) that remains after these large amounts were withdrawn is not adequate to sustain an increase in reimbursement rates into the future. Without additional funding for the State Program, the only option to meet the need for increased treatment reimbursement rates is to reduce the overall number of clients served.

As of this writing, HCA/DBHR is determining recommendations for increasing rates for other behavioral health providers. However, because there is no federal funding for problem gambling, additional treatment funding would need to come from the state, either as an increase in the percentage of business and occupation tax collected on gambling revenue, general state funds (GF-S), and/or another source. Until funding is increased to the state problem gambling account, HCA is unlikely to raise reimbursement rates because doing so will decrease the overall amount of treatment that can be provided.<sup>90</sup>

### **In Progress: Cover problem gambling treatment under Medicaid for individuals enrolled in Apple Health.**

Unlike other behavioral health and substance use disorders, the federal government does not provide funding for problem gambling treatment, despite that a high percentage of individuals struggling with a gambling addiction also have one or more co-occurring disorders (mental health/substance use).<sup>91</sup>

Additionally, for every individual struggling with a gambling addiction, it is estimated 10 to 12 people around them are also burdened (family, friends, work, school, etc.) due to the individual's gambling addiction. Untreated gambling addiction can lead not only to work, school, and family disruptions but also, in some cases, law enforcement intervention and incarceration, suicide attempt, and hospitalization.

Currently, HCA provides limited treatment services for problem gambling through the State Program, but these services fall outside of the Washington Apple Health (Medicaid) program. Funding for the State Program comes solely from the state problem gambling account,<sup>92</sup> and it is insufficient to meet the anticipated need for the current and future biennia. Allowing Medicaid-enrolled individuals to access care through Apple Health will enable the State Program to focus funding on treatment for non-Medicaid enrolled individuals.

In Washington State, approximately two million people are enrolled in Apple Health (Medicaid).<sup>93</sup> Adding problem gambling treatment as a covered service would expand this evidence-based treatment to all eligible adult clients.

- In Spring 2021, the Washington State Legislature approved a state match for covering problem gambling treatment under Medicaid (estimated at 31 percent state funds and 69 percent federal funds), to begin in SFY2023, contingent upon an approved addition to the State Medicaid Plan.
- The State Plan Amendment will likely be submitted to CMS in the later part of 2022 or early 2023. If inclusion of problem gambling treatment is approved by CMS, the earliest estimated start date would be in calendar year 2024.

## **In Progress: Evaluate problem gambling helpline practices and recommend improvements.**

Currently in Washington State, ECPG has hosted and maintained the Problem Gambling Helpline (1-800-547-6133) for over 25 years.<sup>94,95</sup>

Phone helplines continue to be among the most accessible ways for people to connect with a counselor and get the assistance they need. Many states have their own helplines. The National Council on Problem Gambling (NCPG) offers a national helpline number. NCPG is in the process of determining and implementing improvements that further the ‘no wrong door’ national strategy for those seeking help for problem gambling.

### **Ongoing Efforts**

#### *Nationally – NCPG and State Affiliates*

NCPG’s Helpline modernization project goals include:

- Improving access to high-quality services for individuals and their families
- Ensuring that the national Helpline network provides an excellent standard of care

#### *Statewide – ECPG*

As part of ECPG’s Problem Gambling Helpline Enhancement Plan for 2022-2024, the Council is conducting the following work:

- Developing a feasibility study to implement a warm transfer process for calls to the Washington Problem Gambling Helpline (1-800-547-6133).

- Designing a new interactive directory that will allow website visitors to find certified gambling counselors and agencies more easily, including info on screening and referral locations, telehealth, languages spoken, insurance accepted, and other info. ECPG anticipates the new directory will be online by mid-2023.
- Coordinating with NCPG and monitoring changes and enhancements that may benefit or otherwise impact Helpline Services in Washington State, as part of NCPG’s National Problem Gambling Helpline Modernization Project (2022-2024)

#### *State Program*

The Washington State Recovery Helpline (1-866-789-1511) is funded by HCA and includes problem gambling as a topic about which individuals can seek resources through the Helpline. As part of future work, the State Program plans to engage more actively with the Recovery Helpline staff, to ensure that information that is being relayed to callers is accurate and up to date.

# 5 | Key Insights: 2021 Washington State Adult Problem Gambling Prevalence Study

## Prevalence Study Reveals Insights and Informs Report

### Project Background

In 2019, WSGC commissioned a report about gaps and possible needs in problem gambling services. A key finding of the report was that the lack of recent prevalence data for Washington State prevented the researchers from accurately predicting how many adults might need problem gambling treatment services. In response to this concern, the 2020 Legislature passed a budget proviso to appropriate additional funding from the state problem gambling account to conduct a new prevalence study. In response to the impact of the COVID-19 pandemic on human subject research, the 2021 Legislature approved a request from HCA to move the due date and funding authorization forward by one year to June 2022. In June 2022, the report deadline date was formally extended to October 2022, due to the complexity of verifying earlier data analysis. The final report was delivered to the Legislature and the PGTF on October 7, 2022.<sup>96</sup>

### Methods

The 2021 Washington State Adult Problem Gambling Prevalence Study was completed in several stages. In the first stage, an ad hoc Consultation Group was formed to design and finalize the questionnaire.<sup>97</sup> In the second stage of the project, Washington State University's

Social and Economic Sciences Research Center (SESRC) programmed the questionnaire for computer-assisted web interviewing (CAWI) and a self-administered paper-and-pencil questionnaire (SAQ) was created.

All materials were translated into Spanish by the Academy of Languages Institute. In the third stage of the project, the surveys were administered to approximately 49,000 households and completed by 9,413 respondents between July 2021 and early September 2021, resulting in a 19 percent response rate.<sup>98</sup>

### Key Findings

The legislative proviso initiating the 2021 Prevalence Study required HCA to determine the rates of gambling and problem gambling in Washington State, in addition to other topic areas. The survey data was collected from July-September 2021, and respondents were asked to consider the previous 12 months when responding (i.e., during the COVID-19 pandemic). The survey revealed lower-than-expected rates of gambling overall, compared to a non-pandemic year, possibly due to a combination of the closure of land-based gambling and concerns over contracting the virus in public locations. However, the prevalence rate (3.5 percent) of moderate-to-severe problem gambling among adults who gamble was on the higher end of the 'normal' expected range (2-4 percent of all adults who gamble, based on many studies).<sup>99</sup>

**Prevalence rates are reported in this order:**

**1. Gambling—Prevalence among All Adults**

- » Percent of entire population that gambled as compared to All Adults

**2. Problem Gambling—Prevalence of Problem Gambling**

- » Among All Adults (percent of entire population at risk)
- » Among Adults who gamble only (percent of those at risk for problem gambling)

- Past-year gambling participation rates differed significantly by gender, age, ethnicity, marital status, education, employment, and military service.<sup>102</sup>

*More or most likely to have gambled in the past year:*

- » Men were significantly more likely than women
- » Ages 35 to 64
- » Employed (compared to both retired and unemployed/other)
- » Education: Individuals with ‘some college’ (as compared to ‘no college’ or holding a ‘bachelor’s’ or ‘advanced degree’)

## 2021 Prevalence Study Results

**1. Gambling—Prevalence among All Adults<sup>100</sup>**

Figure F on the following page shows the breakout of the number of adults who gambled (light green and purple slices) and adults who didn’t gamble (dark blue).

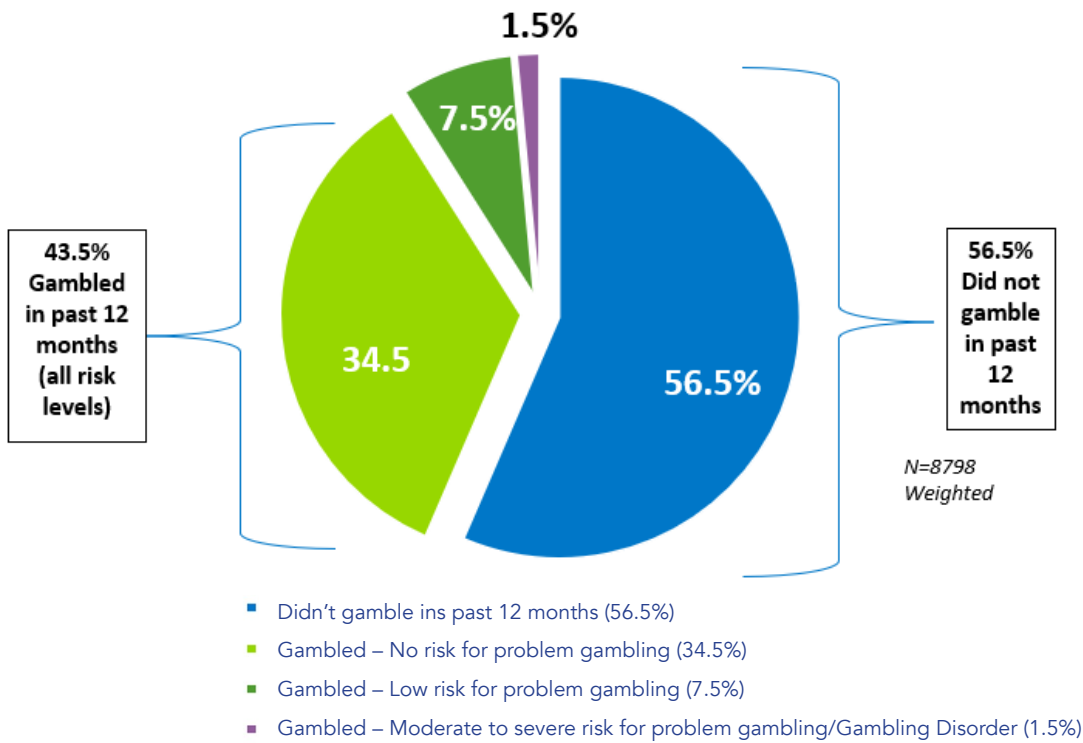
- 43.5 percent of adults acknowledged participating in one or more gambling activities in the past year. 56.5 percent of adults did not report gambling.
- Within the 43.5 percent who gambled, the light green represents those at no or low risk for problem gambling. The purple slice represents those at moderate-to-severe risk for problem gambling.
- Past-year gambling participation was highest for lottery games, Tribal casinos, pull-tabs, bingo, and raffles. Participation in all other types of gambling was 5 percent or less.<sup>101</sup>

*Less or least likely to have gambled in the past year:*

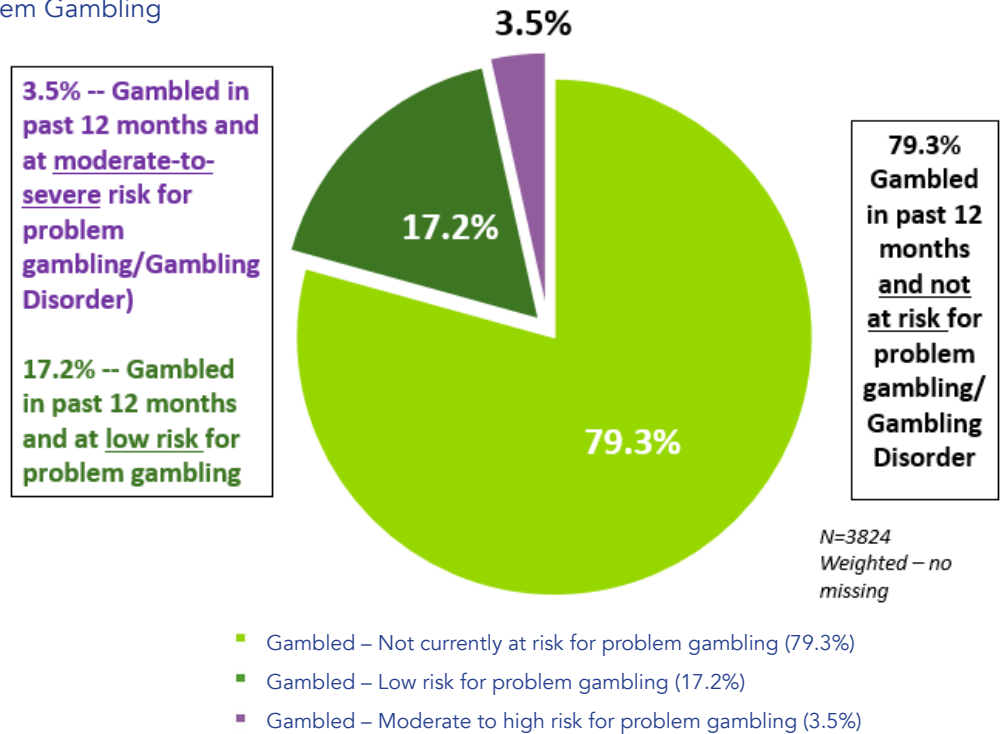
- » Education: Individuals with advanced degrees
- » Never-married people
- » Non-Hispanic
- » No military service



**Figure F:** All Adults, Gambling & Problem Gambling



**Figure G:** Gambling & Problem Gambling



## 2021 Prevalence Study Results

### 2. Problem Gambling—Prevalence of Problem Gambling

**Figure G** includes only Adults who gambled (43.5 percent of all adults in previous chart).

- Light green represents the almost 80 percent who are not at risk for problem gambling.
- Dark green represents the 17.2 percent who are at low risk for problem gambling.
- Purple represents the 3.5 percent who are moderate-to-high risk for problem gambling. This is on the higher end of the range that is normally cited (2-4 percent) for adults who gamble.
- People who gambled online (illegal in Washington State) had an overall risk of almost three times (3x) the risk for problem gambling as compared to the group of individuals who gambled overall (10.3 percent versus 3.5 percent).<sup>103</sup>

#### **Estimating the Need for Problem Gambling Services Based on the Prevalence Study**

The 2021 Prevalence study found that 1.5 percent of all Washington State adult residents are at a moderate-to-severe risk for problem gambling, which represents an estimated 90,000 individuals (within the range of 66,000 to 108,000 adults).<sup>104</sup>

Based on research on help-seeking behavior, we estimate that approximately 9,000 Washington State adults experiencing moderate-to-severe gambling problems might seek help, if they knew services were available, affordable, and knew how to locate the services.

Unlike the data above about who is more or less likely to gamble, in the 2021 Prevalence Study demographics were not correlated or not strongly correlated with problem gambling. This should not be interpreted to mean that there are no demographic differences among those at risk for moderate-to-severe problem gambling. Some demographic subgroups for problem gambling were too small to be able to accurately determine statistical significance.

#### **Other Findings**

##### *Attitudes about gambling availability and benefits vs. harms*

- Nearly one-third of Washington State adults (31 percent) reported that gambling was too widely available while only a small percentage (4.6 percent) reported that gambling was not available enough.
- Most Washington State residents (68 percent) stated that the harms of gambling outweighed the benefits, while 25 percent believed that the benefits and harms of gambling were about equal, and 7.5 percent believed that the benefits of gambling outweighed the harms.
- People who gambled were more likely than those who did not gamble to believe that the benefits of gambling outweigh the harms, while people experiencing gambling problems were more likely to believe the harms of gambling outweigh the benefits.

##### *Awareness of problem gambling services*

- Awareness of problem gambling was highest from television and radio sources while awareness from other sources was much lower.

- Awareness of services for those experiencing gambling problems was highest for Gamblers Anonymous and the Washington State’s Problem Gambling Helpline (hosted by ECPG).
- Awareness level was low for of clinical services and treatment provided by community behavioral health, Tribal behavioral health, and/or funded by the State Program.
- Individuals who reported gambling and reported difficulties with depression, anxiety, or other mental or behavioral health issues were more likely to be at a moderate-to-severe risk for problem gambling than those who gambled but did not report any of these issues.

### *Intersection of gambling and problem gambling with mental health or substance use*

Problem gambling has been shown in many studies and research to be associated with other mental health issues including mood disorders and substance use disorders. The 2021 Prevalence Study found the following correlations (based on past 12 months before the survey):<sup>105</sup>

- Individuals who reported gambling and tobacco use were more like to be at a moderate-to-severe risk for problem gambling than those who reported gambling but had not used tobacco
- Individuals who reported gambling and cannabis use were more likely to be at a low risk (compared to no risk) for problem gambling than those who reported gambling but had not used cannabis.
- Individuals who reported gambling and hallucinogen use were more likely to be at a moderate-to-severe risk for problem gambling than those who reported gambling but had not used hallucinogens.

### **Future Directions**

There is the potential for deeper analysis of the 2021 Prevalence Study data, additional research activities to supplement these findings, and subsequent iterations of this survey. Areas of future research include deeper analysis of the data to understand the correlations between types of online activities and problem gambling, coding, and evaluating write-in responses, and assessing if there’s a correlation between types of gambling activities and risk levels for problem gambling. Additionally, partners may also submit additional data analysis that they would like to have completed. The ability to do more analysis on this dataset will be determined by possible future funding and interest levels.

To understand how gambling and problem gambling impacts specific populations in greater depth, possible research projects include:

- Conducting online ‘panel’ surveys using a low-cost, opt-in methodology that recruits individuals who are members of specific populations, with the goal of better understanding impacts, help-seeking behaviors, and barriers to accessing services:
  - » Individuals who gamble and are experiencing problems, Youth and Young Adults, Older Adults, individuals from potentially higher risk communities including racial, ethnic, and/or cultural groups, etc.
- Conducting an Impact Study of gambling and problem gambling that includes a cost-benefit analysis for Prevention and early intervention.
- Conducting a follow-up survey of the Washington State Adult Problem Gambling Survey in the next 3 to 5 years, using the same methodology (‘replication survey’). Measuring the same behaviors and using the same methods employed in the Washington State Adult Problem Gambling Survey at subsequent points in time will be useful in monitoring changes over time in gambling attitudes, awareness of problem gambling services, gambling participation, and problem gambling prevalence in the state.

Ultimately, for the State Program to conduct research projects in the future will depend on the funding available.

# 6 | Looking Ahead: Areas of Interest and Concern

The PGTF was also tasked by our state legislature to highlight impending issues. The following four topic areas have been highlighted by PGTF members for future consideration.

## 1. Impact of Online Gambling

This topic relates to projected future conditions. There are advocates interested in opening and legalizing more forms of gambling including internet/online in Washington State. Decisionmakers and stakeholders should anticipate this reality and be prepared to address the impacts associated with the likely increase in gambling availability.

Over 5 percent of Washington State's adult population engages in online gambling, despite that it is illegal, not regulated, enforced, taxed, and unlike legal gambling, has no consumer protections required by Washington State.

PGTF members expressed concerns regarding the impacts of online activities that can be addictive but were not included in the original scope of work in the proviso that established the Task Force. The Task Force requested that the Prevalence Study include questions about these online activities and determine the percentage of respondents that engage in these activities. To meet that request, HCA worked with the survey researchers and consultant group creating the survey to generate a series of questions to collect this data.

### Consideration

Establish a work group to understand and make recommendations regarding mitigating the impacts from illegal online gambling to Washington State residents (especially youth), their loved ones, work and school, and the overall impact to society and costs to the state of this illegal activity.

### Significant findings about the prevalence of illegal online gambling in Washington State

- Even though online gambling is illegal in WA State, 5.1 percent of all adults report having gambled online in the past 12 months of the survey period.
- Among adults who gambled, 11.3 percent reported gambling online.
- Adults who gambled online are at almost three times (3x) the risk for moderate-to-severe problem gambling as compared to all those who gambled using any method (10.3 percent vs. 3.5 percent).<sup>106, 107</sup>

## 2. Address Impact of Problem Gambling on Youth

With sports betting now legal in more than 30 states, including online legal sports betting, the exposure and access to gambling has increased, for Youth as well as for Adults. The 2021 Healthy Youth Survey (HYS) found that 9.4% reported having gambled in the past year. Since no one under 18 is allowed to gamble at land-based gambling facilities,<sup>108</sup> it's highly likely that Youth are gambling online. Despite that online gambling in WA State is currently illegal, Youth can easily participate in online activities using their personal mobile devices, including mobile phones, tablets, and laptops. In addition to accessing online gambling sites, Youth often play games that have elements of gambling, of which they may not be aware. This can also lead to concerns about problem gambling. In the 2021 HYS, of Youth who said they'd gambled in the past 12 months, 6.3% reported that their gambling had negatively impacted one or more aspects of their life, including school, family, and relationships.

Research suggests that individuals who begin gambling by age 12 are at a considerably higher risk to develop a gambling disorder later. And the prevalence of problem gambling is higher among Youth and Young Adults than among Adults (6-8% of those who gamble, compared to 2-4% for adults). WA State policy makers and agency staff should prioritize Youth Prevention for problem gambling/Gambling Disorder:

*"Youth problem gambling has become an emergent public health issue, and adolescents constitute a vulnerable age group for the development of gambling-related problems...The present study evaluated the efficacy of an integrative intervention to prevent youth problem gambling...The findings demonstrated that the intervention was effective*

*in improving correct knowledge about gambling, reducing misconceptions and attitudes, and decreasing the total hours spent gambling per week...(and) was also effective in reducing the number of at-risk/problem gamblers during the study period.' (Calado, F. et.al., Journal of Gambling Studies, 2020)."*

No federal funding is available for prevention and treatment of problem gambling, including for Youth Prevention. Legislators and health departments are starting to recognize the need for awareness and prevention programs that reach young people. For example, in Virginia, Delegate Sam Rasoul sponsored the first state law in the country requiring all public schools to teach students about the risks of gambling, which became law in April 2022.

*"Rasoul's law, which had nearly unanimous support in the legislature, requires the state Board of Education to develop and distribute to all school divisions educational materials on gambling as part of the existing curriculum on substance misuse. Gov. Glenn Youngkin signed the measure in April." (Stateline Article, July 12, 2022, Marsha Mercer)*

### Consideration

Establish a work group on Youth Problem Gambling either formally through state law or informally consisting of subject matter experts, key partners from state agencies, non-profit problem gambling services organizations, Tribes, and others who work in problem gambling, youth prevention, and education. Consider enacting legislation to require that Youth Prevention for problem gambling be included in public schools along with existing curricula on tobacco use and substance abuse.



### 3. Consumer Protections

PGTF members felt it was important to work towards additional consumer protections and responsible gaming for any future expansion of gambling.

#### Considerations

- For online gambling developers and vendors: If online gambling is legalized, require that third-party vendors include strong consumer protections such as:
  - » the ability to track time and money played;
  - » blocking oneself from playing for a period;
  - » not receiving promotional emails or texts; and
  - » not marketing to youth under 18 years.
- Ensure that commercial online vendors contribute equitable, proportionate funding for problem gambling and consumer protections, to be designated to the state problem gambling account.

### 4. Sustaining Attention on Problem Gambling

Following the submission of this 2022 PGTF Final Report, there will be no formal venue for governmental, non-governmental and Tribal stakeholders to discuss critical and emergent issues, most notably to assess gaps and needs for achieving comprehensive treatment, prevention, awareness, and outreach services. An ongoing group is needed to meet the challenges in this dynamic issue area. Such a statewide committee could host a roundtable or conference periodically on critical problem gambling policy and program issues.

#### Consideration

Establish a new statewide committee on problem gambling either formally through state law or informally to tackle critical and emergent issues in the sphere of problem gambling.

# 7 | Problem Gambling Task Force Structure and Process

## Task Force Offers Deep Experience and Perspective

In 2019, the Washington State Legislature awarded proviso funding of \$100,000 to WSGC to initiate and hire a facilitator for a joint legislative task force. The goal of the task force was to assess existing outreach, prevention, and treatment resources for problem gambling and gambling disorder to determine if these services are adequate to meet existing need or should be expanded to reduce the number of people impacted. Due to the behavioral health impacts of problem gambling and gambling disorder, WSGC, in agreement with HCA, determined that HCA/DBHR would be more appropriate as the lead agency role with the PGTF. Through an interagency agreement in Winter 2019, WSGC transferred funding to the State Program with HCA/DBHR, which then contracted with a facilitator, Uncommon Solutions, Inc. (Appendix D: PGTF Proviso – HB 1109 Section 729)

PGTF membership was based on the proviso requirements and included legislators, state agencies, non-profit organizations, Tribal representatives, community members, representatives from commercial and Tribal gaming, and clinical professionals. In partnership with the Gambling Commission, HCA/DBHR recruited members to fill the task force positions.<sup>109</sup>

*Per the proviso, the PGTF was responsible for reviewing:*

- Findings of WSGC’s 2019 Problem Gambling Study and Report submitted to the Legislature in spring 2019.
- Existing prevention, treatment, and recovery services offered by Washington State public, private, and nonprofit entities.
- Existing programs, services, and treatment offered in other states and by the Federal government.

*PGTF members were charged with making recommendations to the Washington State Legislature addressing:*

- How to proceed with a study measuring adult participation in gambling and the prevalence of problem gambling and gambling disorder in Washington State.
- If Washington State should expand state funding for prevention, treatment, and recovery.
- What steps the state should take to improve current licensing and certification of problem gambling health care providers to meet the current and projected demand for services.
- Identifying additional problem gambling areas for consideration and associated actions needed.



The PGTF launched in January 2020 and completed their work in October 2022. Beginning in March 2020, with the onset of the COVID-19 pandemic, all meetings were held online. Members attended quarterly task force meetings from 2020 through October 2022. Topic-specific workgroups met monthly from 2020 through 2021 to surface and hone priorities related to problem gambling prevention, outreach, treatment, recovery, and research. With approval of task force members, staff convened a new Final Legislative Report Workgroup in 2022 to build on the priorities, help craft clear recommendations, and review report drafts. (Appendix E: PGTF Roster and Appendix F: PGTF Charter)

## **PGTF Roles**

### *Chair and Vice Chair*

WSGC Commissioner Julia Patterson, presided at all PGTF meetings. Vice Chair, Brad Galvin, assumed duties of the Chair in Julia's absence. They direct PGTF business, including agenda setting and review of the required legislative reports.

### *Tribal Nations*

PGTF members acknowledged that PGTF Tribal representatives attended on behalf of Federally Recognized Indian Tribes in Washington State, which are sovereign nations, each in a government-to-government relationship with Washington State.

### *Core Group*

The Core Group acted as the PGTF steering committee. The Core Group was responsible for setting the quarterly meeting agendas and guiding overall Task Force direction. The eight-member group consisted of PGTF Chair and WSGC Commissioner Julia Patterson,

Vice Chair Brad Galvin, Senator Steve Conway, State Representative Shelley Kloba, WSGC Executive Director Tina Griffin, Problem Gambling Program Manager Roxane Waldron, and Uncommon Solutions, Inc. facilitators Vic Colman and Meg O'Leary. The group continued to meet regularly through 2022.

## **Workgroups**

Three workgroups convened in April 2020 to delve deeper into three key themes identified at the January 2020 PGTF launch:

- Access to Care, Treatment, and Recovery (CTR)
- Prevention and Outreach (PO)
- Research and Data (RD)

### *CTR, PO, and RD Workgroups*

The CTR, PO, and RD workgroups met online monthly from April 2020 through October 2021. Each workgroup developed priorities related to their focus areas. In June 2020 and September 2020, the workgroups presented recommendations to the full PGTF for further consideration, refinement, and initial prioritization. The workgroup priorities developed in 2020 were included in the Interim PGTF Report and became the focus for the workgroup meetings in 2021. The CTR, PO, and RD workgroups reconvened in February 2021 to continue discussions and refine their priorities by exploring timelines and phasing, anticipated fiscal impacts, and preliminary Prevalence Study results. These priorities were the foundation from which the final legislative recommendations took shape.

### *AP Workgroup*

In October 2020, a new Advocacy and Policy (AP) workgroup was convened to establish a liaison between the PGTF and partners who can help champion and amplify PGTF recommendations. They did not develop recommendations. The AP workgroup met as needed from 2020 through 2022 to support the PGTF and keep an eye on policy related opportunities to guide, leverage, and illuminate the PGTF's recommendations.

### *FLR Workgroup*

In March 2022, a new Final Legislative Report (FLR) workgroup was launched to streamline the workgroup process, winnowing the multi-workgroup process down to a single workgroup focused on clarifying the recommendations for a final task force vote, and commenting on the draft report before submittal to the legislature in December 2022. The FLR workgroup was comprised of at least one member from each existing CTR, PO, and RD workgroup. In addition, select members of the CTR, PO, and RD workgroups agreed to be on-call Subject Matter Experts, helping draft and review sections of the report.

### **Workgroup Priority Setting**

The PGTF developed a very specific approach for its CTR, PO, and RD workgroup processes from 2020 through 2021. Led by the two facilitators from Uncommon Solutions, Inc. and the HCA Problem Gambling Program Manager, the workgroups were charged with developing a full slate of actionable strategies. The actionable strategies developed by the three workgroups were the basis of the 2021 Interim Report to the Legislature and the foundation for the recommendations highlighted in this 2022 Final Report to the Legislature.

### **Final Vote and Unanimous Approval of Recommendations**

Throughout the two-year PGTF process, the full task force was kept apprised of the timeline and milestones and were invited to review and comment on the priorities and recommendations surfaced by the workgroups. In 2022, working closely with project staff and the Core Group, FLR workgroup members help craft a list of proposed recommendations for final PGTF approval. PGTF voting members voted on the proposed recommendations at the final quarterly meeting on October 19, 2022. Voting members who were not present at the meeting were invited to vote via an online poll. The vote in favor of the PGTF recommendations reflected in this report was unanimous among the 17 voting members who voted. Three voting members did not vote, and HCA abstained from voting entirely because HCA managed the Problem Gambling Task Force contract.

# END NOTES

- 1 Massachusetts, Oregon, Iowa, Ohio, Nevada, New York are among states with more comprehensive problem gambling programs.
- 2 Current funding allows an average of 350 clients to be treated each year (with an average of 1 assessment and 16-17 clinical treatment sessions).
- 3 WA State Certified Gambling Counselors are certified either by the WA State Gambling Counselor Certification Committee (WSGCCC) or by the International Gambling Counselor Certification Board and must meet requirements of WAC 246-341-0754.
- 4 From Dr. Rachel Volberg, Gemini Research: "It would be advisable to conduct a replication of the Washington State Adult Problem Gambling Survey in 3 to 5 years. Measuring the same behaviors and using the same methods employed in the Washington State Adult Problem Gambling Survey at subsequent points in time will be useful in monitoring changes over time in gambling attitudes, awareness of problem gambling services, gambling participation, and problem gambling prevalence in the state."
- 5 Other ECPG Prevention initiatives include offering evidenced-based curriculum training such as Stacked Deck facilitator-training and working with a Native American Advisory Committee to create a gambling/gaming prevention story and program for Native American youth. ECPG is also the largest provider in WA state for Responsible Gaming training for gaming operators.
- 6 There may be additional private problem gambling treatment that requires private insurance or self-pay (for those who can afford it). However, the PGTF focused on resources that have fewer barriers to accessing services.
- 7 [ECPG List of Certified Gambling Counselors](#). As of December 2022, there are 32 CGCs, serving in 39 locations; at least 3/4ths provide telehealth services. Nine CGC's are employed by Tribes. Services may be provided in English and additional languages.
- 8 [Dept of Health Facility Search Engine](#) (excluding those who are not actively certified and serving clients)
- 9 [Supporting Responsible Gaming](#) - Washington Indian Gaming Association
- 10 Not including the ~3600 Lottery point-of-sale locations, nor licensed pull-tabs, raffles, etc. operators.
- 11 One-hour drive time is a common unit of measurement for accessibility to treatment services and gambling venues
- 12 Certified Gambling Counselors may work at behavioral health agencies and/or be sole providers
- 13 Muckleshoot, Tulalip, Spokane, Stillaguamish, Suquamish, Swinomish, and Yakama Tribal behavioral health agencies employ one or more Certified Gambling Counselors (as of October 2022).

# END NOTES

14 A licensed mental health and/or substance use disorder facility may be licensed as a certified-problem gambling agency if it meets requirements in WAC 246-341-0754.

15 The [HCA Ten Regional Service Areas](#) was re-created to match the GIS-generated versions for this analysis (no change to region boundaries).

16 For readability, this map does not include the ~3,600 locations [WA Lottery](#) points-of-sale locations or locations for other forms of licensed commercial gambling (pull-tabs, bingo, raffles). See also [Organizational Licensees Washington State Gambling Commission](#)

17 [WAC 246-341-0754](#) governs 'problem gambling agencies,' defines basic requirements for Certified Gambling Counselors, and defines the scope of the Washington State Gambling Counselor Certification Committee. Revised July 1, 2021.

18 To become a DOH-certified problem gambling behavioral health agency, an agency must be licensed by DOH as a mental health and/or substance use disorder facility and employ a Certified Gambling Counselor in good standing. If a DOH-licensed agency meets both those requirements, then that agency is eligible to apply to be a 'DOH-certified problem gambling agency.' This pertains to Tribal and non-Tribal behavioral health agencies.

19 [ESHB 1109 Section 729](#), item (ii) (approved in biennial state operating budget 2019-2021 (orig.))

20 In accordance with RCW 71.24.025(26)(c); Section 408(a) of the Indian Health Care Improvement Act, 25 U.S.C. § 1647a(a); and 42 C.F.R. § 431.110 (per Tribal Attestation form) and in concordance with the Government-to-Government relationship between Tribes and the State of Washington, a Tribe may elect to submit a Tribal Attestation for behavioral health services. The attestation confirms that a Tribe's behavioral health agency meets the state's minimum standards and for specific services, as identified by the Tribe on the form (including problem gambling treatment, if selected). Once in force, DOH issues the Tribe a behavioral health license, and include the Tribe on the current list of licensed behavioral health agencies. In these cases, DOH does not conduct regulation or enforcement activities. See <https://doh.wa.gov/sites/default/files/legacy/Documents/Pubs//346114.pdf> (Tribal Attestation form/DOH

21 [WA Tribes Care](#) - Washington Indian Gaming Association

22 Additionally, having or not having a Certified Gambling Counselor on staff is not necessarily a quality indicator of problem gambling treatment services provided by Tribal behavioral health agencies.

23 Certified Gambling Counselor: A licensed mental health and/or substance use disorder professional who has been certified either by the WA State Gambling Counselor Certification Committee or by the International Gambling Counselor Certification Board to be a Certified Gambling Counselor. On-going CE hours are required to maintain this certification. (WAC 246-341-0754). DOH-certified problem gambling agency: An existing licensed mental health and/or substance use disorder agency that has fulfilled the requirements, applied, and been granted a problem gambling agency certification. Requirements include 1) employing a Certified Gambling Counselor, maintain a list of resources for referral, and maintain a written procedure for the response to medical and psychi-atric emergencies. (WAC 246-341-0754). State-certified problem gambling treatment: Problem gambling treatment services offered by a Certi-fied Gambling Counselor or DOH-certified problem gambling agency.

# END NOTES

24 Based on analysis of publicly accessible population data from the American Community Survey (using ArcGIS).

25 For more on the helpline, see [ECPG](#).

26 As mentioned earlier, many Tribal behavioral health programs also offer problem gambling treatment and accept non-Tribal clients in the community.

27 In 2019-2021, the State Program received a one-time generous contribution of \$100,000 from the Recovery Cafe Network and Snoqualmie Tribe. In 2021-2023, HCA was granted an additional appropriation of \$150,000 from the state problem gambling account—if requesting increase appropriation continues in future budget cycles, the State Program Manager estimates that the ‘cushion’ in the state problem gambling account is likely to be depleted within one-to-two budget cycles. A longer-term solution is needed.

28 Another factor is that potential new agencies can be overwhelmed with the contract-ing process. The State Program coordinates with HCA’s Contracting Unit to streamline this process.

29 Per WAC, the State PG Program can only contract with providers meeting requirements in [WAC 182-100-0100](#) – State Problem Gambling Program.

30 As of this writing, the State Program has eleven (11) contracts in force (seven are DOH-certified problem and four are Certified Gambling Counselors who are sole providers).

31 This approach has been adopted by at least one other state program, and Nevada’s state program funding appears to be moving that direction (based on discussion with Nevada staff in Spring 2022).

32 Substance Abuse and Mental Health Services Administration (SAMHSA) Brochure (PEP12-RECDEF) NWITC – Squaxin Island Tribe

33 [NWITC-Squaxin Island Tribe](https://squaxinland.org/northwest-indian-treatment-center/): <https://squaxinland.org/northwest-indian-treatment-center/>

34 [Washington Recovery Alliance](https://washingtonrecoveryalliance.org/about-us/): <https://washingtonrecoveryalliance.org/about-us/>

35 [HCA Recovery Support](http://www.hca.wa.gov/free-or-low-cost-health-care/i-need-behavioral-health-support/what-recovery-support): [www.hca.wa.gov/free-or-low-cost-health-care/i-need-behavioral-health-support/what-recovery-support](http://www.hca.wa.gov/free-or-low-cost-health-care/i-need-behavioral-health-support/what-recovery-support)

36 (1) Evergreen Council on Problem Gambling recovery support resources include a Recovery Community Advisory Committee, podcast episodes, live-stream and on-demand free videos on YouTube, social media content and Twitter Chat Tuesdays during PGAM, awareness campaigns, promotion of healthy activity alternatives to gambling, and a host of training opportunities. Common recovery services topic areas and frequent requests include working with individuals in recovery from gambling, recovery resources, and family recovery needs. (2) Other recovery support resources include social media gambling recovery groups and chat forums, gambling recovery podcasts, self-help website and workbooks, and other gambling support groups not associated with GA/Gam-Anon. (3) ECPG hosts a Recovery Community Advisory Committee as well as podcasts, on-demand content on YouTube, and other recovery-related resources.

# END NOTES

37 In Washington State in 2021, about 80 percent of gambling receipts came from Tribal Gaming. Tribes also provide funding both internally and externally for problem gambling treatment and other related problem gambling services. As the total amount spent by Tribes and the total number of clients served is not available, this section is focused on the State Program funding only, as this information is publicly available. Unfortunately, this does create a gap in knowledge that doesn't fully acknowledge the contributions that Tribes make towards problem gambling services, both in terms of treatment and other services provided and the total amounts donated.

38 [2021 Survey of Publicly Funded Problem Gambling Services in the United States](#) – National Association of Administrators for Disordered Gambling Services (NAADGS).

39 The overall amount of funding makes a big difference. Pennsylvania's 2021 problem gambling budget was \$6.37 million, compared to Washington State's 2021 budget of \$730,500. So, despite that the percentage spent by Pennsylvania on treatment was much lower, the overall amount of funding was more than Washington State spent on treatment during the same period (PA=\$573,300 vs. WA=\$511,350).

40 [2021 Survey of Publicly Funded Problem Gambling Services in the United States](#) – National Association of Administrators for Disordered Gambling Services (NAADGS).

41 Public awareness and prevention = \$26,000 annually (contracted with ECPG for Problem Gambling Awareness Month)

42 Problem Gambling Severity Index score = 5 or above

43 Based on the data, we know that not everyone who needs problem gambling support in Washington State is able to access care, treatment, and recovery services.

44 Tribes are generally known to provide holistic whole-person wraparound behavioral health services, so segregating out specific treatment services for problem gambling would make this process very complex and likely underrepresent the impact of Tribal behavioral health in mitigating problem gambling through their services. Many Tribal casinos have also undertaken Responsible Gaming training with their staff and provide materials with problem gambling resources on site. Tribes, as sovereign nations, are not required to report information about the number and type of problem gambling services provided (including number of clients served, overall spending on treatment, or percentage of spending on treatment versus other services).

45 The completed [2021 Prevalence Study](#) report provided data that inform the recommendations by the PGTF and planning for the State Problem Gambling Program. 2021 Washington State Adult Problem Gambling Prevalence Study Results (June 30, 2022). See Chapter 5 for details.

46 [2021 Healthy Youth Survey](#)

47 [ECPG List of Certified Gambling Counselors](#)

48 Lottery point-of-sale locations are not included in gambling locations analysis as there are ~3600 statewide.



# END NOTES

- 49 National Association of Administrators for Disordered Gambling Services (formerly APGSA)
- 50 [American Community Survey \(ACS\)](#)
- 51 Washington State Agencies: HCA, DOH, WSGC, WHRC, WA Lottery, OFM, and others
- 52 [Evergreen Council on Problem Gambling](#)
- 53 Welte JW, Barnes GM, Tidwell MO, Hoffman JH, Wiczorek WF. The Relationship Between Distance from Gambling Venues and Gambling Participation and Problem Gambling Among U.S. Adults. *J Gambli Stud.* 2016 Dec;32(4):1055-1063. doi: 10.1007/s10899-015-9583-5. PMID: 26615561.
- 54 This may require a change in rules/WAC. Further study is needed to confirm.
- 55 Integrated treatment is the use of multiple treatments for two or more conditions, like pharmacotherapy and psychotherapy. Integrated treatment for co-occurring disorders has been shown to be more effective than treatment for individual disorders with separate treatment plans.
- 56 Problem gambling services include prevention, outreach, awareness, clinical training, education, workforce development, treatment, and recovery support services.
- 57 [2021 WA State Adult Problem Gambling Study report \(pg 34\)](#)
- 58 WAC 246-341-0610 Clinical – Assessment, filed 4/16/19, effective 5/17/19, prior to its revision on July 1, 2021, did require that all assessments include (2)(h) Problem and pathological gambling history. While this was removed in the July 2021 revision, it is not the same as what this report proposes, which is to include an evidenced-based and validated problem gambling screening tool, as opposed to a general and undefined analysis of gambling history.
- 59 2021 Healthy Youth Survey results (9.4 percent reported gambling in the past year, with 6.8 percent of those who gambled reporting negative impacts from their gambling). It is unlawful for any person under the age of eighteen to play in authorized gambling activities including, but not limited to, punchboards, pulltabs, or card games, or to participate in fundraising events. Persons under the age of eighteen may play bingo, raffles, and amusement game activities only as provided in commission rules. See RCW 9.46.228(1).
- 60 The Lottery is not required by law to take such measures but does so voluntarily in recognition of their unique role as a state agency and purveyor of a gambling product.
- 61 This strategy was proposed by PGTF Chair, Commissioner Julia Patterson, on November 30, 2022 and December 1, 2022 in WA State legislative committee work sessions.
- 62 [Problem Gambling Diversion Programs: A review of Implementations and Challenges](#), by Frank Song
- 63 [New Jersey Considers Specialized Court for Gambling Addicts](#) - The Crime Report
- 64 [Ohio Explores Diversion Court For Problem Gamblers Who Commit Crimes](#)

# END NOTES

- 65 As noted earlier in the PG Services Gap Analysis, 11 areas within the state have already been identified as needing access to problem gambling treatment by Certified Gambling Counselors.
- 66 [RCW 41.05.750](#) and [RCW 41.05.751](#)
- 67 [ESHB 1031](#) (Chapter 369, Laws of 2005)
- 68 [RCW 67.70.340\(3\) \(a\)\(b\)](#)
- 69 Does not include \$500,000 appropriated for 2021 Washington State Adult Problem Gambling Prevalence Study.
- 70 [WAC 230-23-030](#)
- 71 It's important to note that since there is no federal funding for problem gambling services, the shortage in funding is felt across stakeholders providing problem gambling services. These services are not yet integrated into behavioral health services provided by public funding, and many of the programs and organizations represented on the Task Force are impacted.
- 72 Original 2021-2023 appropriation is \$1.463 million; \$150,000 was added by additional appropriation to close the treatment funding gap in this biennium. That \$150,000 is not included here.
- 73 A 'real life' outcome would be if the client's quality of life had improved as measured before, during, and after treatment, as compared to a proxy measure such as 'number of months client has been in treatment.' An example of a quality of life clinically administered instrument is the [OO-45.2 tool](#).
- 74 "Responsible Gaming programs operate in compliance and in parallel with state laws and regulations on responsible gaming, including the funding and provision of problem gambling services. In addition, many gaming businesses voluntarily implement programs with a range of responsible gaming measures that go beyond what is required by law or regulation." ([American Gaming Association](#))
- 75 [WAC 230-23-030](#) governs licensee responsibilities under the statewide self-exclusion programs
- 76 [International Center for Responsible Gaming](#)
- 77 Gaming Industry Employees' Responses to Responsible Gambling Training: A Public Health Imperative, June 2011 Journal of Gambling Studies 28(2):171-91 (D. Laplante, H. Gray, et.al.)
- 78 [NASPL-NCPG](#) - Responsible Gambling Verification program for lottery organizations
- 79 [WAC 230-23-030](#) governs licensee responsibilities under the statewide self-exclusion programs.
- 80 The HYS is normally conducted in even years, but due to COVID, the 2020 survey was delayed until 2021.
- 81 [RCW 9.46.228](#)



# END NOTES

82 [WSGCCC](#)

83 Washington State Department of Health – Health Care Provider Credential Database (captured October 20, 2022: [data.wa.gov](https://data.wa.gov))

84 Ibid. Of these, 13.7 percent (4,252) are licensed Substance Use Disorder Professionals (SUDP) or SUDPs-in-training.

85 The State Program and ECPG are both active, non-voting, members of the WSGCCC.

86 [Certified Gambling Counselor Manual](#) pg. 8

87 [Certified Gambling Counselor Manual](#) pg. 31

88 [Center for Medicare and Medicaid Services](#)

89 The State Fiscal Year (SFY) runs from July 1 to June 30.

90 In 2020, DBHR considered raising treatment reimbursement rates by 10 percent, but leadership decided against it because of the impact to availability and access to treatment services.

91 <https://pubmed.ncbi.nlm.nih.gov/23297170/>

92 [RCW 41-05-751](#)

93 [Medicaid in Washington](#)

94 Historically, the State Program funded, in part, the Problem Gambling Helpline. However, after implementation of the Washington Recovery Help Line, funding for the Problem Gambling Helpline was discontinued.

95 [ECPG Problem Gambling Helpline](#)

96 [2021 WA State Adult Problem Gambling Prevalence Study](#) report

97 Consultation group included staff from the HCA/DBHR, the Evergreen Council on Problem Gambling, the University of WA, the WA State University Social & Economic Sciences Research Center, and Dr. Rachel Volberg, Gemini Research.

98 19.2% response rate is within the 18-20% anticipated response rate for this multi-modal survey.

99 In problem gambling prevalence surveys, individuals are classified based on their responses to a valid and reliable problem gambling assessment instrument. The Problem Gambling Severity Index (PGSI) has been the dominant instrument used to assess problem gambling prevalence rates world-wide since 2005 and was selected for use in the 2021 Prevalence Study.

# END NOTES

100 For the purposes of the 2021 Prevalence Study, a designation of 'having gambled' refers to participation in any form of gambling, not as a measure of frequency or intensity.

101 Individuals could select one or more gambling activities.

102 Only statistically significant findings are reported here. Based on comparisons of confidence intervals (chi-square methodology). Some subgroups were too small to determine if findings were significantly different within the demographic category.

103 Based on Question 21 only (2021 WA State Adult Problem Gambling Prevalence Study).

104 Using the point estimate of 1.5 percent, with a confidence interval of 1.1 percent to 1.8 percent.

105 This study is not constructed to determine causation, only correlation. Studies that seek causation are complex and generally conducted by highly resourced research institutes, universities, or organizations.

106 Based on response to Question 21 about participation in gambling online (cross-tabbed with 'all gamblers').

107 Additional data was collected to look at the prevalence among all respondents (both 'gamblers' and 'non gamblers') of gambling online, gaming online (only), and activities that are in the 'grey area' where online gambling and gaming overlap. This data has not yet been fully analyzed, but preliminary analysis indicates that many more respondents said they had participated in activities that are known to be online gambling than reported online gambling earlier in the survey. Although HCA does not currently have specific plans to analyze this data further, this section of the survey is an area ripe for further study and analysis.

108 The WA State Gambling Commission highly restricts gambling for people under 18.

109 In Fall 2019, the Health Care Authority's Office of Tribal Affairs sent Dear Tribal Leader (DTL) letters to all 29 federally recognized Tribes, inviting each Tribe to designate an individual to participate on the Tribe's behalf.

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in WA State – GIS Maps
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- J Data Sources and Works Cited
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- M Timeline of Gambling and Problem Gambling Services in WA State

**PGTF**

**Problem Gambling Task Force**

# APPENDICES

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Appendix A

# **Current & Proposed Budget Models – WA State Problem Gambling Program**

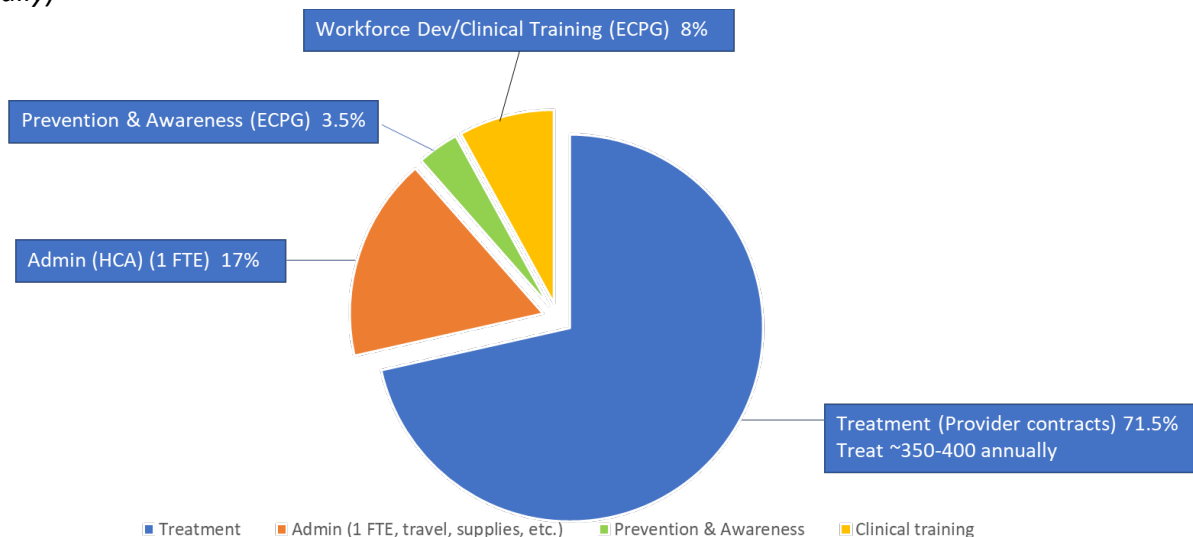
# APPENDIX A: CURRENT & PROPOSED BUDGET MODELS – WA STATE PROBLEM GAMBLING PROGRAM

## CURRENT MODEL

Currently, the WA State Problem Gambling Program’s funding comes from an appropriation of \$1.461 million (2021-2023 biennium). A one-time additional appropriation of \$150,000 was added to close the anticipated gap between funding available and treatment services needed.<sup>1</sup>

Under the Current budget model, the State Program spends about 72% for treatment services, with the remaining 28% split between Clinical training/Prevention and administration of the program.<sup>2</sup>

**Figure 1: Current Budget Model – State Problem Gambling Program funding (\$730,500 annually)**



The current model doesn’t include these elements found in robust programs:<sup>3</sup>

- Year-round Prevention and Outreach activities (for both Youth and Adults)
- On-going Workforce Development to meet expanded need for treatment services
- Program monitoring and evaluation based on quality-of-life measures for assessing progress and outcomes for clients and program effectiveness or for research

<sup>1</sup> This does not include \$500,000 that was appropriated from the state problem gambling account for the 2021 WA State Adult Problem Gambling Prevalence Study.

<sup>2</sup> This includes \$26,000 for Problem Gambling Awareness Month in March each year that is contracted with the Evergreen Council on Problem Gambling—the only on-going prevention activity sponsored by the State Problem Gambling Program.

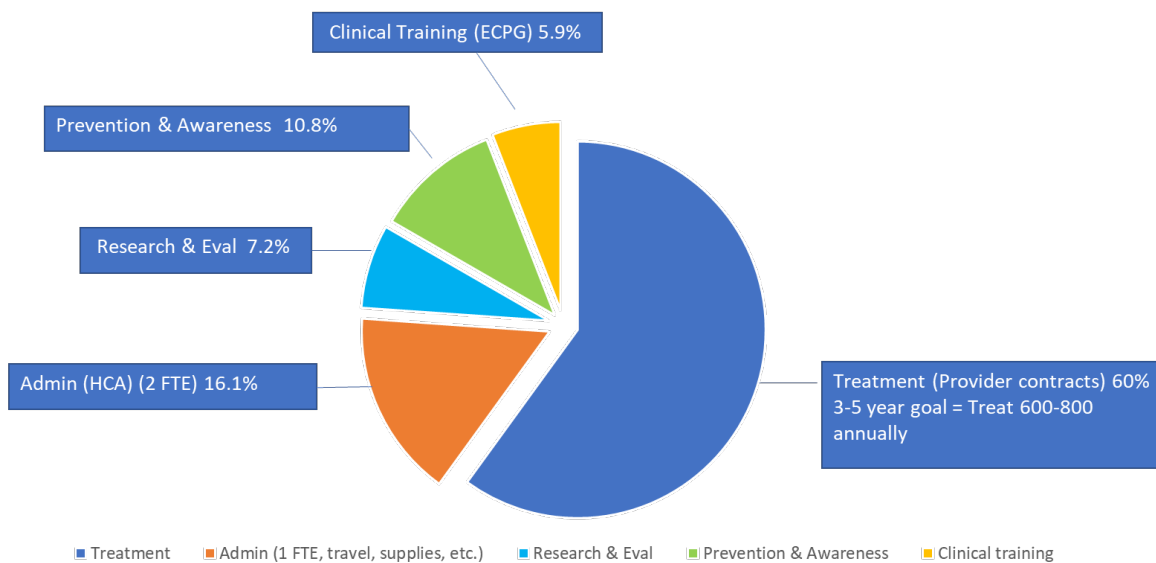
<sup>3</sup> Current FTE in State Program = 1.0 FTE. As the State Program activities grow, an additional 1.0 FTE is needed.

## PROPOSED MODEL

When considering if and how the State Problem Gambling Program budget could be expanded, the Program Manager researched how other state programs are serving clients. In addition, the National Association for Administrators of Disordered Gambling Services (NAADGS) published the updated State of the States report that lists activities and funding across the country.<sup>4</sup>

Based on this report and additional research, the Program Manager proposed the new funding model for the expansion of services. To fund this level of enhanced services would require doubling the current funding (from \$1.461 million to \$2.8 million in future biennia).<sup>56</sup>

**Figure 2: Proposed Budget Model – State Problem Gambling Program**



### If funded, the Proposed Model will increase funding for existing and new services:

- Assessment & Treatment -- goal to serve double the number of clients within 3-5 years
- Prevention – In-house HCA/DBHR year-round messaging and activities
- Clinical training/workforce development – to serve more clients, more Certified Gambling Counselors are needed, and in areas and at-risk populations currently unserved or underserved
- Allow program to add an additional 1.0 FTE (for a new total of 2 FTE) to do community outreach and coordinate enhanced services
- Program monitoring and evaluation based on quality-of-life measures
- Funding for research, including future prevalence studies and/or other related topics

<sup>4</sup> [2021 Survey of Publicly Funded Problem Gambling Services in the United States](https://naadgs.org/wp-content/uploads/2022/06/NAADGS_2021_Survey_of_Publicly_Funded_Problem_Gambling_Services_in_the_United_States_v2.pdf): [https://naadgs.org/wp-content/uploads/2022/06/NAADGS\\_2021\\_Survey\\_of\\_Publicly\\_Funded\\_Problem\\_Gambling\\_Services\\_in\\_the\\_United\\_States\\_v2.pdf](https://naadgs.org/wp-content/uploads/2022/06/NAADGS_2021_Survey_of_Publicly_Funded_Problem_Gambling_Services_in_the_United_States_v2.pdf)

<sup>5</sup> Annually the increase would be from \$730,500 to \$1.4 million

<sup>6</sup> Note: HCA's DBHR Director Keri Waterland has indicated her support for the proposed model; review within HCA is continuing and no major concerns have been put forth as of this writing.



Appendix B

# **Availability of Gambling & Problem Gambling Treatment in WA State – GIS Maps**

## APPENDIX B: AVAILABILITY OF GAMBLING AND PROBLEM GAMBLING TREATMENT IN WA STATE

### **Project: Determining need and locations for additional Certified Gambling Counselors – by Region**

To assess the availability of problem gambling treatment services in Washington State, staff from both the WA State Health Care Authority and Uncommon Solutions, Inc. (USI) worked together to define the scope for the following visual representations (maps).<sup>1</sup> Using ArcGIS<sup>2</sup>, USI staff then merged existing data about the locations of various gambling activities and problem gambling services to create these maps, below.

These maps allowed staff to easily identify the areas with population centers that currently do not have a Certified Gambling Counselor within a 1-hour drive time. The State Program, Evergreen Council on Problem Gambling, and the Washington State Gambling Counselor Certification Committee, are now in discussion about how to best recruit and train existing behavioral health clinicians (including substance use disorder professionals) for unserved areas.<sup>3</sup> In addition to the proposed seven areas on these maps, additional regions that have only one Certified Gambling Counselor will also be considered for recruitment.<sup>4</sup>

For ease of use, both the 2021 Washington State Adult Problem Gambling Prevalence Study and this project used a map of the Ten Regional Service Areas (as defined by the Health Care Authority for Apple Health).<sup>5</sup>

Maps A through F, when viewed in order, explain the process of identifying where legal gambling activity is happening in the state, where problem gambling treatment options are currently available (including Tribal Behavioral Health agencies and Certified Gambling Counselors), and the regions that need additional Certified Gambling Counselors. Recruiting and training clinicians to become certified is a multi-year process, so to significantly increase the workforce by 25% or more is estimated to take between 3-5 years.<sup>6</sup>

---

<sup>1</sup> Project staff: Ethan Meade (USI) and Roxane Waldron (HCA/DBHR); guidance and support by Felix Rodriguez (HCA). This document prepared by Roxane Waldron, State Problem Gambling Program Manager (HCA/DBHR)

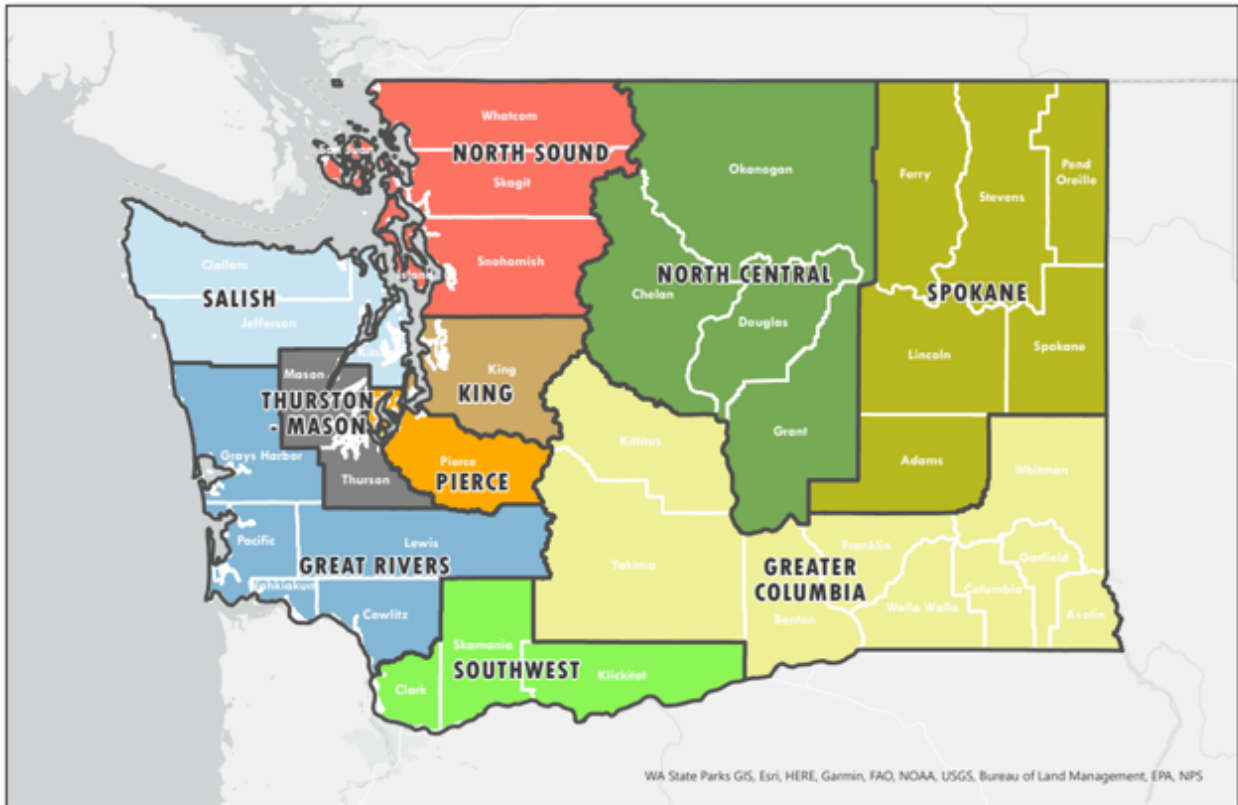
<sup>2</sup> GIS is the acronym for 'geographic information system' (info: <https://www.esri.com/en-us/what-is-gis/overview>)

<sup>3</sup> WSGCCC has a stated goal to increase the current Cert. Gambling Counselor workforce by 25% as soon as possible.

<sup>4</sup> This analysis uses the '1-hour drive time' as a standard measurement for access to gambling & treatment

<sup>5</sup> [HCA's version of this map](#) was re-created to match the GIS-generated versions for this analysis (no change to regions)

<sup>6</sup> [WA State Certified Gambling Counselor information \(ECPG\)](#)



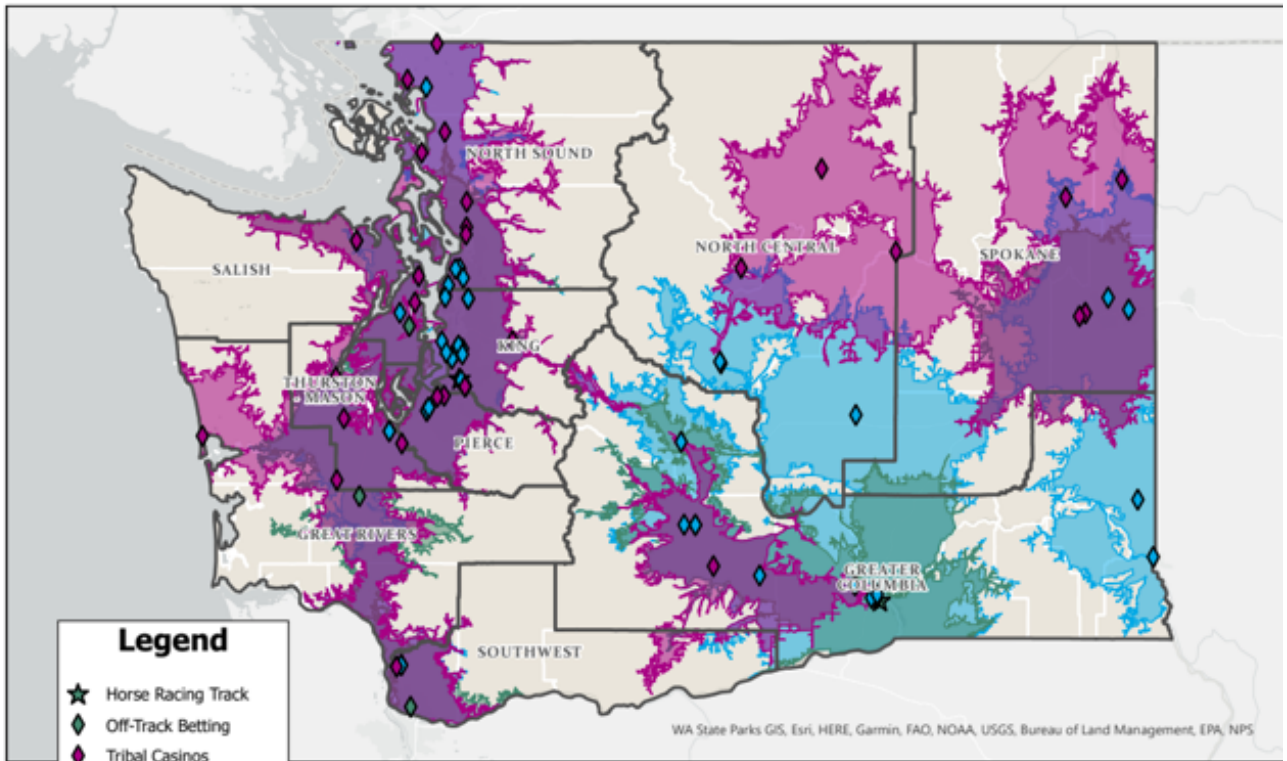
## The Ten Regional Service Areas of Washington State

### Map A: Gambling locations within WA State <sup>7</sup>

This map shows the locations of land-based (brick and mortar) legal gambling in Washington State (not including Lottery point-of-sale locations), as well as 1-hour drive times to the location from surrounding areas.

- Dark pink diamond indicates a Tribal Casino
- Blue diamond indicates a commercial house-banked card room
- Star indicates horseracing track, and dark green diamond indicates off-track betting location
- Areas covered by pink (Tribal Casinos), light blue (commercial house-banked card rooms), and teal (horse racetracks/off-site betting) are within 1-hour drive time, with overlapping 1-hour drive time indicated by the overlay of combined colors (example: purple is the overlap of Tribal Casinos and commercial house-banked card rooms).
- Areas without color (grey) fall outside of the 1-hour drive time limit.

<sup>7</sup> Does not include the approximately 3600 Lottery point-of-sale locations throughout WA State at grocery stores, mini-marts, and other venues. 'Where to Play' search: <https://walottery.com/WhereToPlay/>



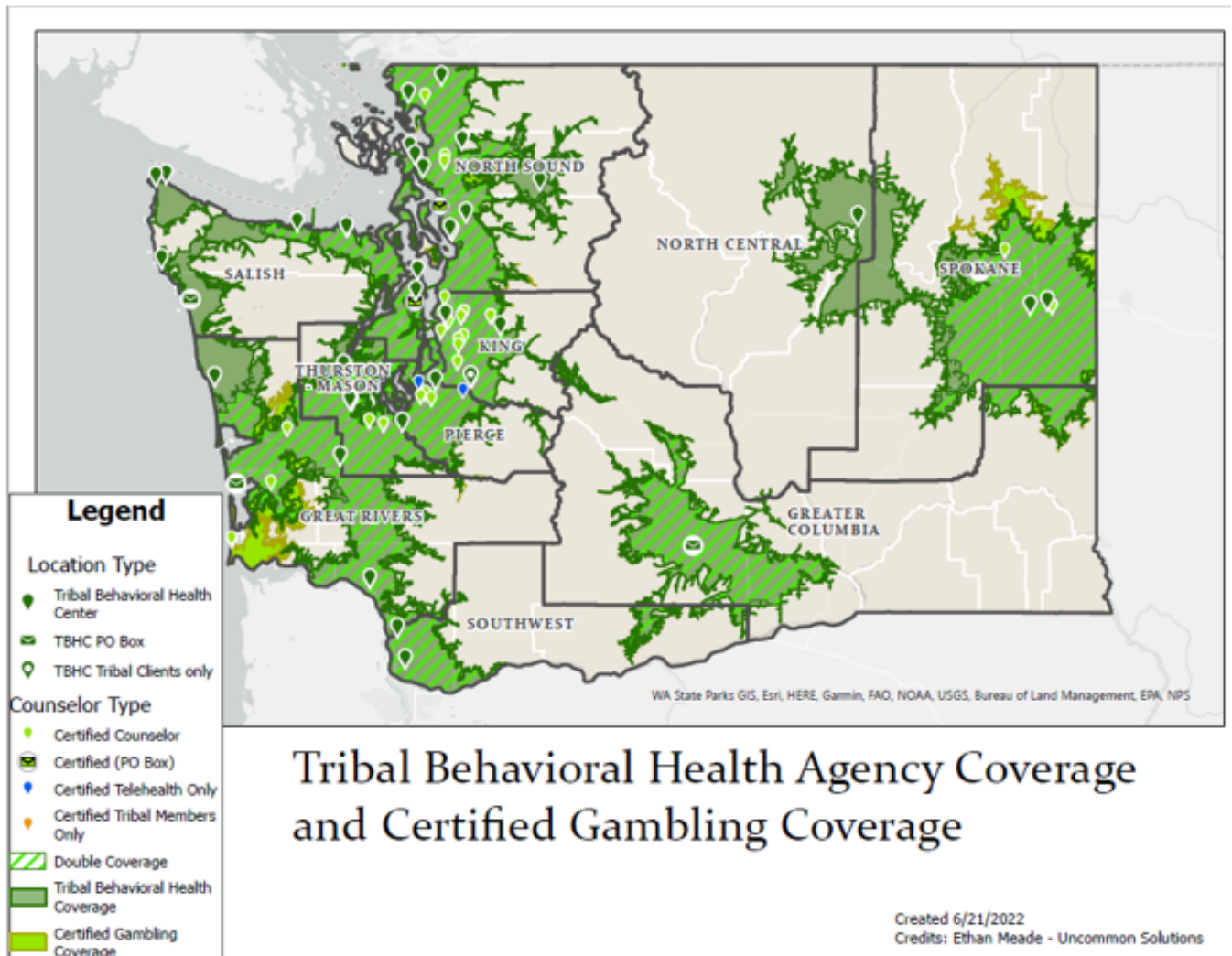
## Horse Racing, House Banked Card Room, and Tribal Casino Drive Times

Created 6/21/2022  
Credits: Ethan Meade - Uncommon Solutions

**Map B: Tribal Behavioral Health Agencies & Certified Gambling Counselors**

This map shows the locations and overlapping 1-hour drive time coverage of the Tribal Behavioral Health (Tribal BH) agencies and the Certified Gambling Counselors.

- Light green 'pips' indicate the Certified Gambling Counselors and 1-hour drive time (edged in yellow) – this includes Cert. Gambling Counselors who work at Tribal BH agencies.
- Dark green 'pips' are the Tribal BH agencies & the dark green coverage is 1-hour drive time.
- 'Cross hatching' is where the 1-hour drive times coverage areas overlap for Tribal BH and Certified Gambling Counselors.
- The areas with no color (grey) have NO problem gambling treatment coverage at all (neither a Tribal BH agency nor a Certified Gambling Counselor) within 1-hour drive time



### **Map C: Gambling availability by Type compared to Certified Gambling Counselors**<sup>8</sup>

This map **combines the gambling locations and 1-hour drive times with the locations of Certified Gambling Counselors** (Map A with selected data from Map B).<sup>9</sup>

- Light green areas indicate 1-hour drive time to Certified Gambling Counselor(s). A number of these Certified Gambling Counselors are employed by Tribal Behavioral Health agencies<sup>10 11</sup>
- Areas in pink, blue, or aqua (including those that overlap) but are not covered by light green are within 1 hour drive time of gambling activity and do not have a Certified Gambling Counselor within 1 hour drive time.
- Areas with no color (grey) have no gambling activities nor a Certified Gambling Counselor.

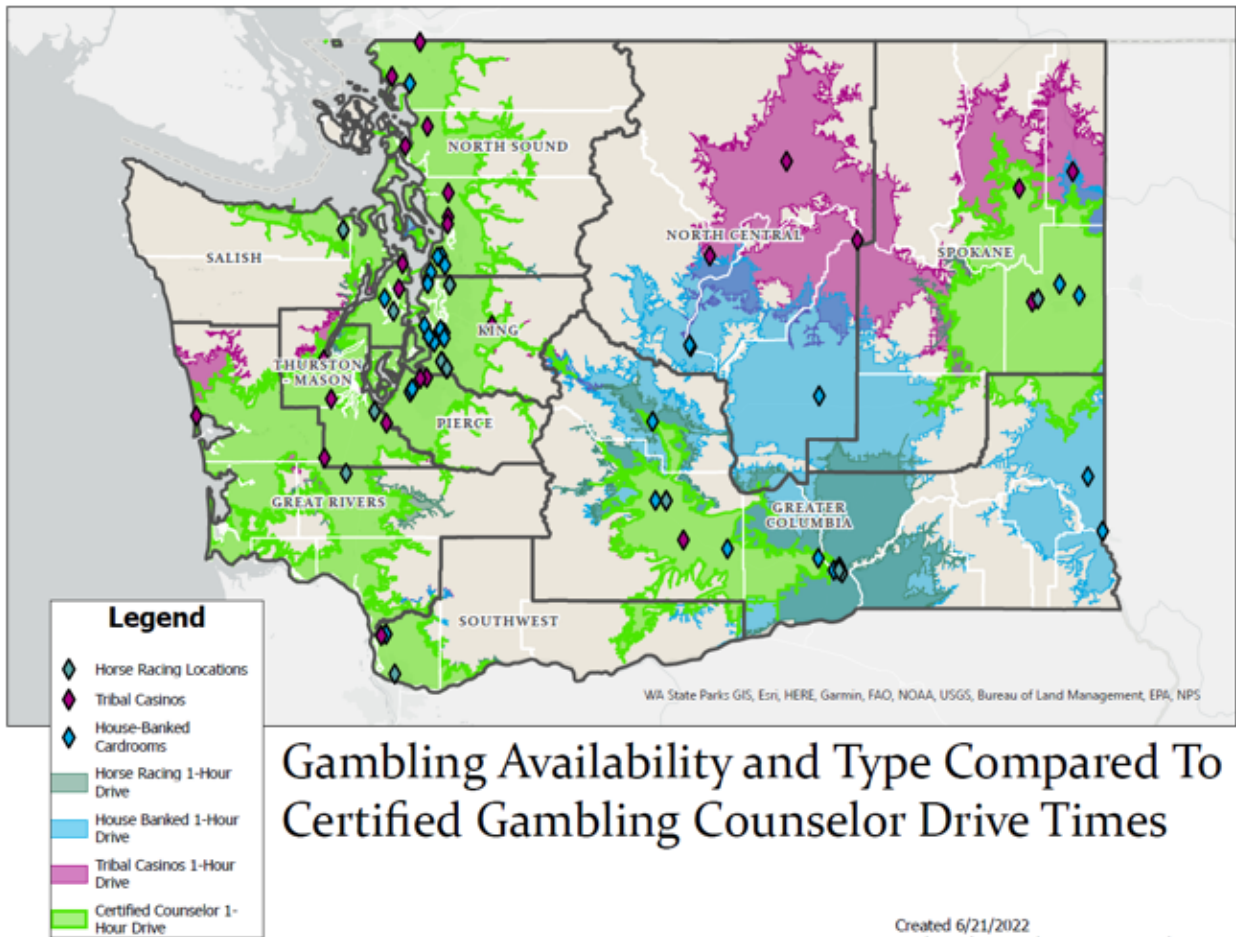
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<sup>8</sup> Does not include Lottery point-of-sales locations (approximately 3600 across the state)

<sup>9</sup> Tribal Behavioral Health Agencies that employ one or more Certified Gambling Counselors are included

<sup>10</sup> Note: Areas not included in the light green coverage areas may have a Tribal BH clinic that does not employ a Certified Gambling Counselor but does offer problem gambling treatment. – Tribes can offer many offer problem gambling treatment services, per their websites). Most Tribal BH agencies accept both Tribal and non-Tribal clients. For more info, visit [WA Tribes Care - Washington Indian Gaming Association](#)

<sup>11</sup> This mapping project is focused on the services for which the State Problem Gambling Program provides treatment reimbursement. The State Program only contracts with Certified Gambling Counselors (sole providers) and DOH-certified problem gambling treatment agencies that meet requirements as described in [WAC 246-341-0754](#). Because of this, this map doesn't include Tribal BH programs that don't currently employ a Certified Gambling Counselor, even if they may offer problem gambling treatment.



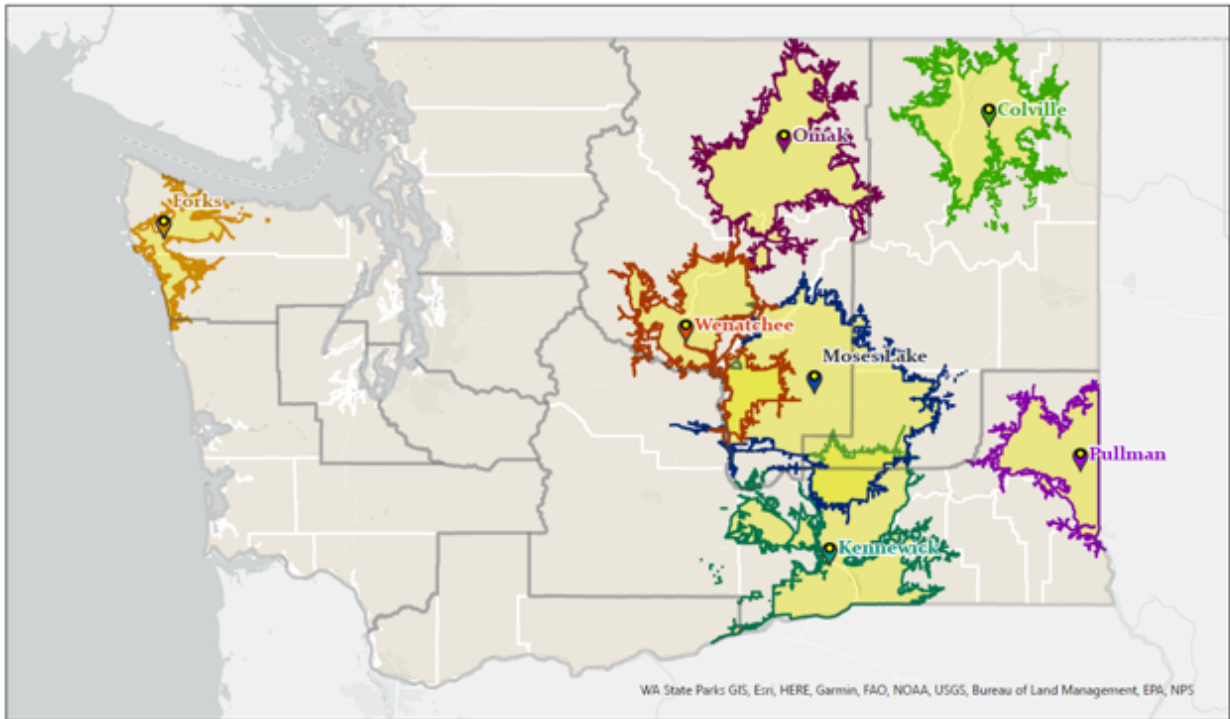
**Map D: Proposed recruitment areas for Certified Gambling Counselors**

Based on the gaps identified in Map C, staff has been able to identify the population areas below (in yellow) that currently have no Certified Gambling Counselor—each one has its own color outline.



- Forks (tan outline)
- Omak/Okanogan (maroon outline)
- Wenatchee (red outline)
- Moses Lake/Ephrata (dark blue outline)
- Colville (light green outline)
- Pullman (purple outline)
- Tri-Cities/Kennewick (dark green outline)

Other areas under consideration and not shown on this map are Clarkston-Lewiston as well as regions or population centers that only have one Certified Gambling Counselor agency.





### Legend

-  Labeled Hypothetical Counselor Locations
-  Hypothetical 1-hour drive time

## Proposed Certified Gambling Counselors

Created 6/21/2022  
Credits: Ethan Meade - Uncommon Solutions

### **Map E: Significantly increased coverage with Proposed Certified Gambling Counselors**

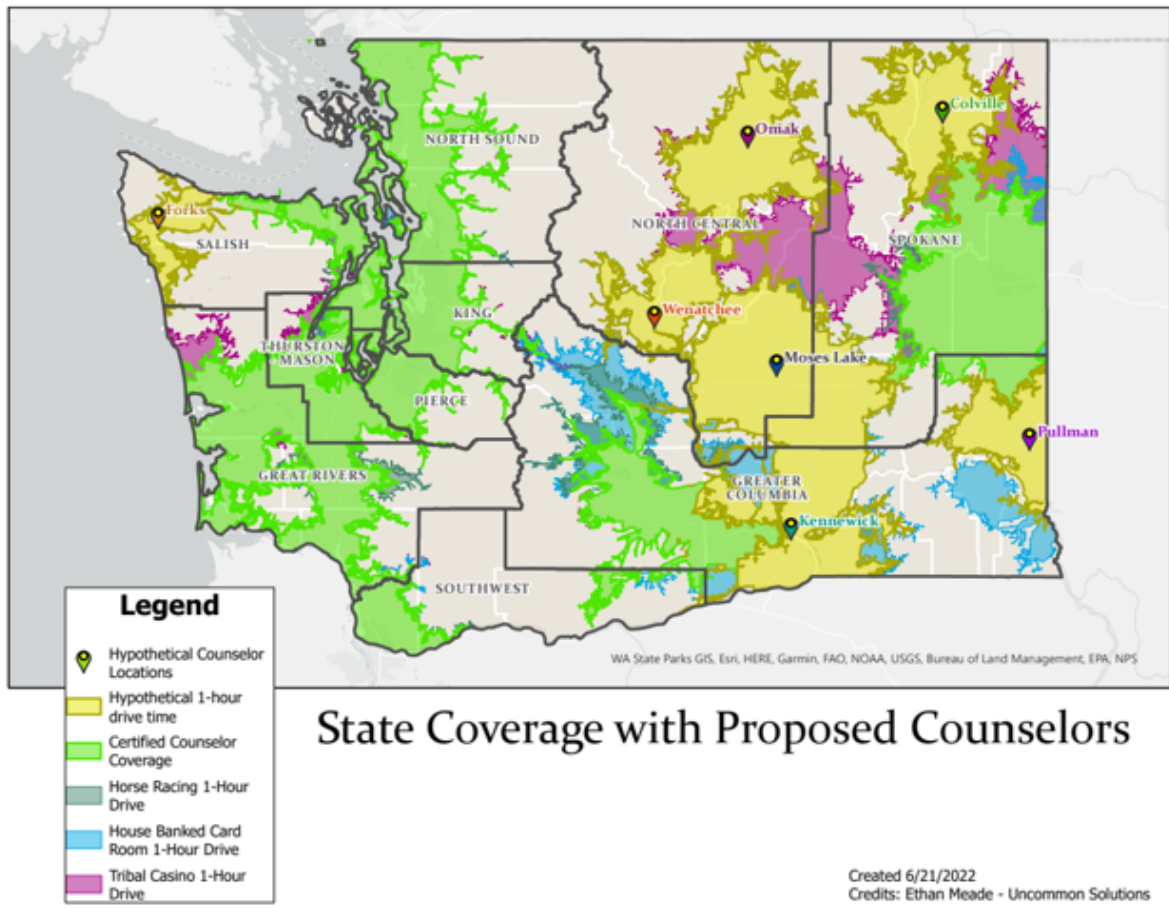
Map E shows both current Certified Gambling Counselors (light green areas) with the addition of the proposed new Certified Gambling Counselors (yellow areas), overlaid upon the availability of gambling by type. Pink, light blue, and teal areas are gambling activity that is outside the 1-hour drive time to a Certified Gambling Counselor. Areas with no color (grey) have no gambling activity nor Certified Gambling Counselor within 1 hour drive time.

The goal with this expansion is to ensure that population centers have access to Certified Gambling Counselors. This plan will **increase overall coverage of the population by over 600,000 people, focused in**



Eastern and rural parts of the state that don't currently have access to treatment with a Certified Gambling Counselor.<sup>12</sup>

For individuals in areas that don't have problem gambling treatment within an hour, or when individuals can't easily access face-to-face treatment (due to immobility, lack of transportation, and/or distance), most Certified Gambling Counselors and DOH problem gambling-certified treatment agencies are continuing to offer telehealth/telemedicine options. Tribal Behavioral Health agencies are another important resource for problem gambling treatment, and most serve both Tribal and non-Tribal clients in the community.<sup>13</sup>



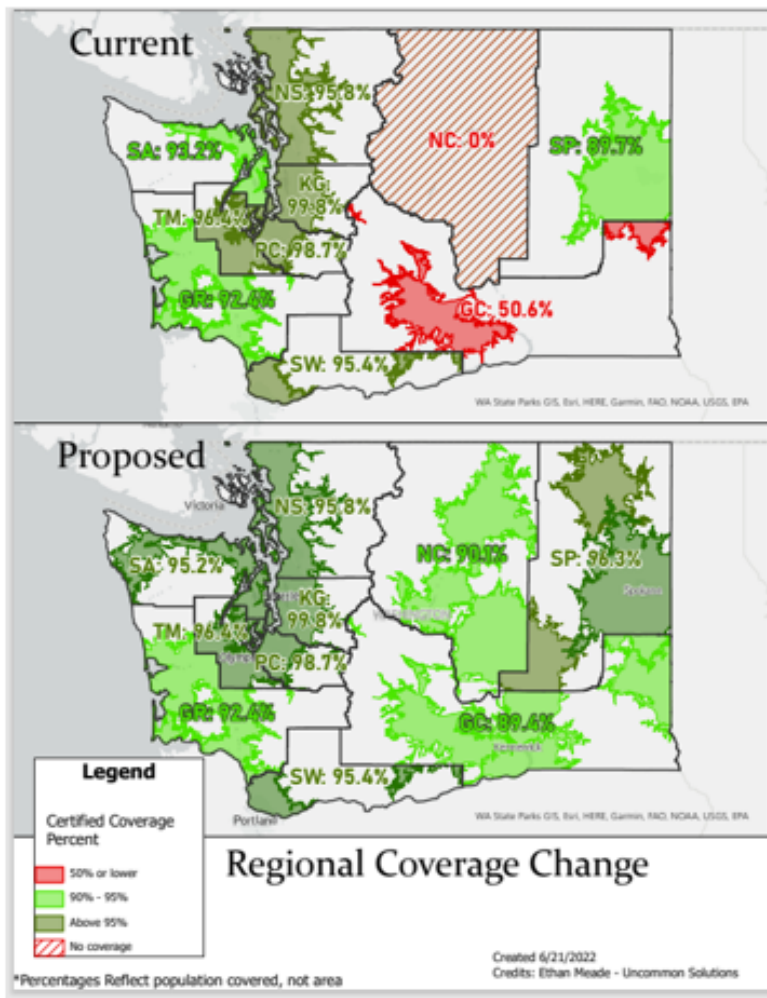
<sup>12</sup> Based on analysis of publicly-accessible population data from the American Community Survey (GIS)

<sup>13</sup> [WA Tribes Care - Washington Indian Gaming Association](#)

## Map F: Current vs. Proposed Certified Gambling Counselor Locations – Impact

This map has two versions:

- Current** -- Percentages of the population covered in each region (as of March 2022)
- Proposed** -- Impact of adding Certified Gambling Counselors in the proposed areas (3-5 years)



The top map (**Current**) shows the percentage of the population (not geographic area) in each region that currently have access to a Certified Gambling Counselor within a 1-hour drive time.

This ranges from 0% in North Central (NC), to 99.8% in King County (KC).

The lower map (**Proposed**) shows the percentage of the population within a 1-hour drive time in each region AFTER adding Certified Gambling Counselors as proposed in Map E. The regions below will have increased access to one or more Certified Gambling Counselor(s) with North Central (NC) and Greater Columbia (GC) showing the largest percentage increases:<sup>14</sup>

- Greater Columbia (GC) = 50% → 90%
- North Central (NC) = 0% → 90%
- Salish (SA) = 93.2% → 95.2%
- Spokane (SP) = 89.7% → 96.3%

**Conclusion:** These findings support the Problem Gambling Task Force’s recommendation to **Increase the number of Certified Gambling Counselors**. Due to the time required by candidates to complete the training and supervised hours and the final exam (approximately two years), if initiated in early 2023, the implementation phase of this plan is estimated to take between in 3-5 years (to be completed by 2026-2028).

<sup>14</sup> Over 90% of Certified Gambling Counselors currently active are on the Western side of the Cascades. Increasing the number of available Certified Gambling Counselors on the Eastern side of the state has long been an area of concern.

Appendix C

# **Recovery Support Services in WA State**

## Appendix C: Recovery Support Services in Washington State (partial list)

This list includes a variety of Recovery Support services available within WA State. Many behavioral health agencies offer recovery support groups or other recovery services that may not be listed here

### *Peer recovery support organizations*

- Consumer Voices Are Born (Vancouver)
- Clubhouse model (Bellevue, Everett, Seattle, Spokane)
- Peer WA model (Kent, Olympia, Seattle, Spokane)
- Recovery Café model (Aberdeen, Everett, Longview, Orting, Pt. Townsend, Seattle/South Seattle\*, Spokane, Tacoma, Vancouver)

### *Tribal behavioral health recovery support*

- Northwest Indian Treatment Center (Squaxin Island Tribe – facility in Elma)
- Many Tribal behavioral health agencies (focused on whole-person holistic care)\*

### *Related recovery services*

- Kittitas County Recovery (Ellensburg)
- Trilogy Recovery Community (Walla Walla)
- Washington Recovery Alliance (advocacy, legislation, training & education. Coalitions: Benton-Franklin, Central WA, King County, North Sound, Pierce County, Salish, SWWA, Thurston-Mason)

### *State recovery support resources (Health Care Authority)<sup>1</sup>*

- Washington state Recovery Help Line (1-866-789-1511)
- Recovery Housing
  - Washington Alliance for Quality for Recovery Residences (45 residences)
  - Oxford Houses (347 residences)
  - WA Foundational Community Supports (jobs/housing/living independently)
  - Family and Adult Coordinated Entry Sites for people experiencing homelessness

*(\*) indicates locations known to include problem gambling as a specific recovery services topic*

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<sup>1</sup> Services and more info can be found on [HCA's Recovery Support website: https://www.hca.wa.gov/free-or-low-cost-health-care/i-need-behavioral-health-support/what-recovery-support](https://www.hca.wa.gov/free-or-low-cost-health-care/i-need-behavioral-health-support/what-recovery-support)

Appendix D

**PGTF Proviso –  
HB 1109 Section 729 (2019)**

CERTIFICATION OF ENROLLMENT  
**ENGROSSED SUBSTITUTE HOUSE BILL 1109**

66th Legislature  
2019 Regular Session

Passed by the House April 28, 2019  
Yeas 57 Nays 41

---

**Speaker of the House of Representatives**

Passed by the Senate April 28, 2019  
Yeas 27 Nays 21

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**President of the Senate**

Approved

---

**Governor of the State of Washington**

CERTIFICATE

I, Bernard Dean, Chief Clerk of the House of Representatives of the State of Washington, do hereby certify that the attached is **ENGROSSED SUBSTITUTE HOUSE BILL 1109** as passed by the House of Representatives and the Senate on the dates hereon set forth.

---

**Chief Clerk**

FILED

**Secretary of State  
State of Washington**

1 General Fund—State Appropriation (FY 2021) . . . . . \$15,309,000  
2 TOTAL APPROPRIATION. . . . . \$16,540,000

3 The appropriations in this section are subject to the following  
4 conditions and limitations: The appropriations are provided solely  
5 for expenditure into the long-term services and supports account  
6 pursuant to Second Substitute House Bill No. 1087 (long-term services  
7 and supports). This constitutes a loan from the general fund and must  
8 be repaid, with interest, to the general fund by June 30, 2022. If  
9 Second Substitute House Bill No. 1087 (long-term services and  
10 supports) is not enacted by June 30, 2019, the amounts appropriated  
11 in this section shall lapse.

12 NEW SECTION. **Sec. 727. FOR THE HEALTH CARE AUTHORITY—INDIAN**  
13 **HEALTH IMPROVEMENT REINVESTMENT ACCOUNT**

14 General Fund—State Appropriation (FY 2021) . . . . . \$708,000  
15 TOTAL APPROPRIATION. . . . . \$708,000

16 The appropriation in this section is subject to the following  
17 conditions and limitations: The appropriation is provided solely for  
18 expenditure into the Indian health improvement reinvestment account  
19 created in Senate Bill No. 5415 (Indian health improvement). If the  
20 bill is not enacted by June 30, 2019, the amount provided in this  
21 section shall lapse.

22 NEW SECTION. **Sec. 728. FOR THE OFFICE OF FINANCIAL MANAGEMENT—**  
23 **FOUNDATIONAL PUBLIC HEALTH SERVICES**

24 General Fund—State Appropriation (FY 2020) . . . . . \$5,000,000  
25 General Fund—State Appropriation (FY 2021) . . . . . \$5,000,000  
26 Foundational Public Health Services Account—State  
27 Appropriation. . . . . \$12,000,000  
28 TOTAL APPROPRIATION. . . . . \$22,000,000

29 The appropriations in this section are subject to the following  
30 conditions and limitations: The appropriations are provided solely  
31 for distribution as provided in section 2, chapter 14, Laws of 2019  
32 (foundational public health services).

33 NEW SECTION. **Sec. 729. FOR THE GAMBLING COMMISSION—PROBLEM**  
34 **GAMBLING TASK FORCE**

35 General Fund—State Appropriation (FY 2020) . . . . . \$100,000

1 TOTAL APPROPRIATION. . . . . \$100,000

2 The appropriation in this section is subject to the following  
3 conditions and limitations:

4 (1) The appropriation in this section is provided solely for  
5 expenditure into the gambling revolving account for the gambling  
6 commission to contract for a facilitator to staff and assist with a  
7 joint legislative task force on problem gambling as provided in  
8 subsection (2) of this section. At a minimum, the contract must  
9 provide for the facilitation of meetings, to moderate the discussion,  
10 provide objective facilitation and negotiation between work group  
11 members, ensure participants receive information and guidance to  
12 assist in their preparation and timely response for meetings, and to  
13 synthesize agreements and recommendations ensuring the task force  
14 meets its reporting requirements.

15 (2) A joint legislative task force on problem gambling is  
16 created. The task force membership is composed of:

17 (a) One member from each of the two largest caucuses of the  
18 senate, appointed by the president of the senate;

19 (b) One member from each of the two largest caucuses in the house  
20 of representatives, appointed by the speaker of the house of  
21 representatives;

22 (c) A representative from the health care authority;

23 (d) A representative from the department of health;

24 (e) A representative from the gambling commission;

25 (f) A representative from the state lottery;

26 (g) A representative from the horse racing commission;

27 (h) A representative from a nonprofit organization with  
28 experience in problem gambling treatment and recovery services;

29 (i) Two representatives with experience in problem gambling  
30 treatment and recovery services, at least one of whom must be from a  
31 federally recognized Indian tribe;

32 (j) A member of the public who is impacted by a gambling problem  
33 or gambling disorder;

34 (k) A representative from a problem gambling recovery group or  
35 organization;

36 (l) A representative from a mental health provider group or  
37 organization;

38 (m) A representative from a licensed gambling business or  
39 organization;



1 (n) A representative from a federally recognized tribal gaming  
2 operation, group, or organization; and

3 (o) Other representatives from federally recognized Indian  
4 tribes, state agency representatives, or stakeholder group  
5 representatives, at the discretion of the task force, for the purpose  
6 of participating in specific topic discussions or subcommittees.

7 (3) The task force shall engage in the following activities:

8 (a) Review findings of the gambling commission's problem gambling  
9 study and report completed in 2018-2019;

10 (b) Review existing prevention, treatment, and recovery services  
11 to address problem gambling and gambling disorders in this state by  
12 public, private, and nonprofit entities;

13 (c) Review existing programs, services, and treatment to address  
14 problem gambling and gambling disorders in other states and the  
15 federal government;

16 (d) Make recommendations to the legislature regarding:

17 (i) How to proceed forward with a state prevalence study  
18 measuring the adult participation in gambling and adult problem  
19 gambling in this state;

20 (ii) Whether this state should expand state funding for  
21 prevention, treatment, and recovery services to address the need for  
22 these programs; and

23 (iii) What steps the state should take to improve the current  
24 licensing and certification of problem gambling providers to meet the  
25 current and projected future demand for services; and

26 (e) Identify additional problem gambling areas for consideration  
27 and any actions needed to ensure the state and/or regulatory agencies  
28 are effectively addressing problem gambling in an attempt to reduce  
29 the number of persons impacted by this disorder.

30 (5) Staff support for the task force must be provided by the  
31 agencies, departments, and commissions identified in subsection  
32 (2)(c) through (g) of this section. The state agencies, departments,  
33 and commissions identified in subsection (2)(c) through (g) of this  
34 section may enter into an interagency agreement related to the  
35 provision of staff support for the task force. Unless it is expressly  
36 provided for in the agreement between the agencies, departments, and  
37 commissions, nothing in this subsection requires staff of each of the  
38 agencies, departments, and commissions identified in subsection  
39 (1)(c) through (g) of this section to provide staff support to the  
40 task force.

1 (6) Legislative members of the task force are reimbursed for  
2 travel expenses in accordance with RCW 44.04.120. Nonlegislative  
3 members are not entitled to be reimbursed for travel expenses if they  
4 are elected officials or are participating on behalf of an employer,  
5 governmental entity, or other organization. Any reimbursement for  
6 other nonlegislative members is subject to chapter 43.03 RCW.

7 (7) The task force shall submit a preliminary report of  
8 recommendations to the appropriate committees of the legislature by  
9 November 1, 2020, and a final report by November 30, 2021.

10 NEW SECTION. **Sec. 730. FOR THE OFFICE OF FINANCIAL MANAGEMENT—**  
11 **OUTDOOR EDUCATION AND RECREATION ACCOUNT**

12	General Fund—State Appropriation (FY 2020)	. . . . .	\$750,000
13	General Fund—State Appropriation (FY 2021)	. . . . .	\$750,000
14	TOTAL APPROPRIATION.	. . . . .	\$1,500,000

15 The appropriations in this section are subject to the following  
16 conditions and limitations: The appropriations are provided solely  
17 for expenditure into the outdoor education and recreation account for  
18 the state parks and recreation commission's outdoor education and  
19 recreation program purposes identified in RCW 79A.05.351.

20 NEW SECTION. **Sec. 731. FOR THE OFFICE OF FINANCIAL MANAGEMENT—**  
21 **COMMUNICATION SERVICES REFORM**

22	General Fund—State Appropriation (FY 2020)	. . . . .	\$2,000,000
23	General Fund—State Appropriation (FY 2021)	. . . . .	\$2,000,000
24	TOTAL APPROPRIATION.	. . . . .	\$4,000,000

25 The appropriations in this section are subject to the following  
26 conditions and limitations: The appropriations in this section are  
27 provided solely for expenditure into the universal communications  
28 services fund to fund the temporary universal communications services  
29 program pursuant to Second Substitute Senate Bill No. 5511 (broadband  
30 service). If the bill is not enacted by June 30, 2019, the amounts  
31 appropriated in this section shall lapse.

(End of part)

## Appendix E

# **PGTF Roster**

## Problem Gambling Task Force Member Roster | 2022

\* Indicates a voting member (there are 21 voting members)

First Name	Last Name	Title/Role
<b>Amanda *</b>	Benton	Deputy Sec., Horse Racing Commission
<b>Dallas *</b>	Burnett	Director, Squaxin Island Tribal Regulatory Authority
<b>Hilarie *</b>	Cash	Clinical Director, ReSTART Life
<b>Vicki *</b>	Christophersen	Maverick Gaming
<b>Victor</b>	Colman	Uncommon Solutions, Facilitator
<b>Sen. Steve *</b>	<b>Conway</b>	<b>Senator, State Senate</b>
<b>Brandi *</b>	Crowe	Exec. Director, Puyallup Tribal Gaming Agency
<b>Rosina</b>	DePoe	Deputy, WIGA
<b>Alexandria *</b>	Desautel	Exec. Director, Lake Roosevelt Community Health Center / Colville Tribes
<b>Tony</b>	Edwards-Lenton	Prevention Systems Manager & Youth Spec. HCA/DBHR
<b>Brad *</b>	Galvin	PGTF Vice-Chair / Clinician, Brief Therapy Works
<b>Rebecca *</b>	George	Exec. Director, WIGA
<b>Maureen *</b>	Greeley	Executive Director, ECPG
<b>Tina *</b>	Griffin	Interim Director, WSGC
<b>Harumi *</b>	Hashimoto	Interim Assoc. Clinical Dir, Recovery Services, ACRS
<b>Melissa</b>	Hurt-Moran	CD Clinical Manager, Kalispel Tribe of Indians
<b>Ryan *</b>	Keith	HCA / DBHR, Program Manager – <b>abstained from final vote</b>
<b>Rep. Shelley *</b>	Kloba	Representative, State House
<b>Amber *</b>	Lewis	Lewis Consulting, (for Chair Forsman & the Suquamish Tribe)
<b>Ty</b>	Lostutter	Clinical Psychologist, UW & ECPG Board Member
<b>Meg</b>	O'Leary	Uncommon Solutions, Facilitator
<b>Julia *</b>	Patterson	PGTF Chair / Commissioner, WSGC
<b>Ricki *</b>	Peone	Health & Human Services Director, Spokane Tribe of Indians
<b>Cosette</b>	Rae	CEO, ReSTART Life
<b>Tana</b>	Russell	Assistant Director, ECPG
<b>Ruby *</b>	Takushi	Director of Programs, Recovery Café Network
<b>Roxane</b>	Waldron	HCA / DBHR—State Program Gambling Pgm Manager
<b>Nanci *</b>	Watson	Community Member
<b>Keri</b>	Waterland	Director, DBHR within HCA
<b>Kristi *</b>	Weeks	Director of Legal Services, Lottery
<b>Kevin *</b>	Zenishek	Exec. Dir. Casino Operations, Northern Quest Resort & Casino (Kalispel Tribe)

Appendix F

# **PGTF Charter**

## **Problem Gambling Task Force (PGTF) Charter**

FINAL | adopted at July 28, 2020 PGTF Meeting

### **Purpose**

In 2019, the Washington State Legislature awarded proviso funding to the Washington State Gambling Commission (WSGC) to facilitate a joint legislative task force to review existing outreach, prevention and treatment resources for problem gambling and disordered gambling in order to determine if these services need to be increased in order to reduce the number of people impacted. The Health Care Authority (HCA) State Problem Gambling Program holds the lead agency role for the PGTF, and coordinates with the WSGC to meet the goals of the proviso.

### **Duration**

The PGTF convened in January 2020 and will complete their work by November 2021.

### **Scope and Activities**

To further explore and address challenges and opportunities related to problem gambling and gaming in Washington state, the PGTF will engage in reviewing:

- Findings of the WA State Gambling Commission 2019 Problem Gambling Study submitted to the Legislature in Spring 2019
- Existing prevention, treatment and recovery services offered by Washington state public, private and non-profit entities
- Existing programs, services and treatment offered in other states and by the Federal government

PGTF members are tasked with making recommendations to the Washington State Legislature. These recommendations will provide the foundation for the interim and final reports due to the legislature in November 1, 2020 and November 30, 2021 respectively. Recommendations will include:

- How to proceed with a state prevalence study measuring adult and youth participation in gambling and adult and youth problem gambling and gaming
- Whether Washington state should expand state funding for prevention, treatment and recovery services
- What steps the state should take to improve current licensing and certification of problem gambling health care providers
- Identify additional problem gambling areas for consideration and associated actions needed

## **Roles and Responsibilities**

### *PGTF Chair and Vice Chair*

- The Chair, Commissioner Julia Patterson, shall preside at all PGTF meetings.
- The Vice Chair, Brad Galvin, will assume duties of the Chair in her absence.
- The Chair and Vice Chair shall have general supervision and direction of Task Force business, including review of the required legislative reports.

### *PGTF Members*

- Participate in quarterly PGTF meetings (missing no more than one meeting unless sending a delegate or due to excused absences as agreed-upon with the chairperson).
- Participate in one workgroup that meets monthly via remote access.
- Review technical documents and provide guidance.
- Provide input to issues, strategy and direction.
- When necessary, engage outside resources and expertise to help fill knowledge gaps.
- Make recommendations to the Washington State Legislature. These recommendations will provide the foundation for the interim and final reports due to the legislature in November 1, 2020 and November 30, 2021 respectively.
- Receive no compensation or reimbursement from HCA or WSGC for expenses related to their services.

### *Workgroup Members*

- Participate in monthly 90-minute Zoom calls.
- Actively participate in necessary information gathering and sharing.
- Develop priorities related to their workgroup focus areas.
- Present recommendations to full PGTF for further consideration and refinement.

### *Health Care Authority (HCA) + Washington State Gambling Commission (WSGC)*

- Provide the necessary background material and resources.
- Provide timely information to the PGTF in accessible formats.
- Listen to the PGTF and facilitate discussion about how their comments are considered.
- Listen to and consider public comment.
- Develop and submit the interim and final reports due to the legislature.
- WSGC and HCA are coordinating state legislative proviso funding to contract with facilitators (Uncommon Solutions) with HCA as the contract manager.

### *Task Force Representatives from Tribal Nations*

- PGTF members acknowledge and recognize PGTF Tribal representatives are attending on behalf of Federally Recognized Indian Tribes in Washington State, which are sovereign nations, each in government-to-government relationship with Washington State.
- Each Tribe has been invited by the State of Washington to designate one or more representatives to participate on the PGTF in order to provide guidance, perspective, insight and recommendations.

- **Centennial Accord:** <https://goia.wa.gov/rerelations/centennial-accord>
- **Millennium Agreement:** <https://goia.wa.gov/rerelations/millennium-agreement/agreement>

#### *Uncommon Solutions Consultant Facilitators*

- Collaborate closely with HCA, develop PGTF meeting agendas, facilitate, and assist with summarizing meeting highlights.
- Coordinate and summarize workgroup key themes, recommendations and action items.
- Track ongoing list of issues, inquiries and emerging themes and use this as a tool to inform the project team and plan for future PGTF discussions.
- Assist HCA in developing the interim and final reports due to the legislature.

#### **Decision Making**

- The PGTF will make every effort to seek consensus on all decisions. However, in the event that total consensus cannot be achieved, the Chair, Vice Chair and facilitators will lead the Task Force through a modified consensus process, that would require a 2/3 majority rule. Minority opinions will be welcomed and presented to the Task Force for discussion and consideration.
- In the case of a vote, only PGTF members on behalf of their organization may participate, at one vote per organization (or if representing self, one vote per role).

#### **Time Commitment**

Members are asked to commit to meeting once per quarter from January 2020 through November 2021. Each 2-3 hour meeting will be held on a weekday morning or afternoon and will be scheduled in Olympia, the Seattle I-5 corridor, and in Central/Eastern Washington. All Meetings will have remote participation option and call-in capability. If the meeting occurs over the lunch hour, food will be provided. Members are also strongly requested to participate in one workgroup that will meet monthly via Zoom.

#### **Ground Rules**

- Listen to the other person without interrupting.
- Welcome diverse opinions as an opportunity to learn and ask questions to understand the other person's perspective.
- Respect confidentiality of fellow PGTF members and ask permission to share any statement another PGTF member makes in settings outside the Task Force.



## Appendix G

# **Certified Gambling Counselors in WA State**



## **Certified Gambling Counselors in Washington State**

(Names in [Blue](#) are Nationally Certified Gambling Counselors)

### **Anacortes** (Skagit County)

**Ginger Johnson, SUDP, WSCGC-I**

(360) 588-2800

didg<sup>w</sup>álič Wellness Center

8212 S March Point Road

Anacortes, WA 98221

### **Arlington** (Snohomish County)

**Ronald Bruesch, SUDP, NCAC-I, WSCGC-I**

(425) 308-2638 or (360) 572-3526

Stillaguamish BHP

5700 172<sup>nd</sup> Street NE Suite B

Arlington, WA 98223

### **Auburn** (King/Pierce County)

**Julia Joyce, MAEd., MS, SUDP, LMHCA, WSCGC-I**

(253) 804-8752

Muckleshoot Behavioral Health

17813 SE 392<sup>nd</sup>

Auburn, WA 98002

(Tribal members and their households only)

**Cynthia Tumelson, SUDP, WSCGC-II**

(206) 302-2300

Sound

4238 Auburn Way N

Auburn, WA 98002

## **Bellevue (King County)**

### **William Castillo, Jr., LMHC, SUDP, WSCGC-II, ICGC-I**

(425) 646-4406

Coastal Treatment Services  
12835 Bel-Red Road Suite 145  
Bellevue, WA 98005  
Other languages spoken: Spanish

### **Wanessa Moldestad, ICGC-I**

(425) 646-4406

Coastal Treatment Services  
12835 Bel-Red Road Suite 145  
Bellevue, WA 98005

### **Cosette Rae, MSW, LICSW, ACSW, EMBA, WSCGC-II**

(800) 682-6934

reSTART Life, PLLC  
2002 156<sup>th</sup> Ave NE Suite 100  
Bellevue, WA 98007

### **Margaret Schiltz-Ferris, SUDP, WSCGC-II, ICGC-II**

(425) 646-4406

Coastal Treatment Services  
12835 Bel-Red Road Suite 145  
Bellevue, WA 98005

### **Donna Whitmire, MA, SUDP, LMHC, WSCGC-II, ICGC-II, BACC**

(425) 227-0447 or (206) 779-5805

1621 114<sup>th</sup> Avenue SE Suite 224  
Bellevue, WA 98004

## **Bonney Lake (Pierce County)**

### **Julia Joyce, SUDP, LMHCA, WSCGC-I**

(253) 906-9964 (Telehealth only)

Bonney Lake, WA 98391

## **Burlington (Skagit County)**

### **James Follman, M.Ed, LMHC, SUDP, WSCGC-II**

(360) 755-1125

Follman Agency  
910 Anacortes Street  
Burlington, WA 98233

## **Elma (Mason County)**

### **Troy Green, SUDP, WSCGC-I**

(360) 358-2779

Freedom Counseling Associates

215 N 3<sup>rd</sup> Street

Elma, WA 98541

## **Ford (Stevens County)**

### **Ricki Peone, MSW, ICGC-II, BACC**

(509) 481-5687

Spokane Tribe of Indians Health and Human Services

4924 Reservation Road

Ford, WA 99013

## **La Conner (Skagit County)**

### **Antonio Sosa, SUDP, WSCGC-I**

(360) 466-1024

Swinomish Wellness Program

17337 Reservation Road

La Conner, WA 98257

Other languages spoken: Spanish

## **Lacey (Thurston County)**

### **Virginia Harris, SUDP, WSCGC-I**

(360) 493-5133

Providence St. Peter Chemical Dependency Center

4800 College Street SE

Lacey, WA 98503

### **Geri Loyal, SUDP, WSCGC-I**

(360) 493-5049

Providence St Peter Chemical Dependency Center

4800 College Street SE

Lacey, WA 98503

## **Lakewood (Pierce County)**

### **Tae Son Lee, MBA, SUDP, WSCGC-II**

(253) 302-3826

Asian Counseling & Treatment Services

9100 Bridgeport Way SW

Lakewood, WA 98499

Other languages spoken: Korean

[www.actsseattle.com](http://www.actsseattle.com)

**Diane Shepard, MA, LMHC, SUDP, WSCGC-II**

(253) 984-9342

Shepard & Associates

3819 100<sup>th</sup> St SW Suite 8C

Lakewood, WA 98499

### **Long Beach (Pacific County)**

**Susan Harris, MS, WSCGC-II, ICGC-II, BACC**

(360) 840-5918

Butterfly Wings

317 10<sup>th</sup> Street

Long Beach, WA 98631

### **Ocean Park (Pacific County)**

**Jan Kaschmitter, MS, LMHC, ACS, CAMS-II, WSCGC-I**

(360) 665-4494

Free by the Sea

25517 Park Avenue

Ocean Park, WA 98640

### **Olympia (Thurston County)**

**Devonna Rowlette, SUDP, CADC-II, CGAC-I, WSCGC-II**

(360) 413-2727 ext 2306

Nisqually Behavioral Health

4840 Journey St SE

Olympia, WA 98513

### **Renton (King County)**

**Janai Felizardo, M.Ed, LMHC, SUDP, WSCGC-II**

(206) 478-8356

4509 Talbot Road S

Renton, WA 98055

**Donna Whitmire, MA, SUDP, LMHC, WSCGC-II,  
ICGC-II, BACC**

(425) 227-0447 or (206) 779-5805

A Renewal Center LLC

401 Olympia Avenue NE Suite 318

Renton, WA 98056

## **Seattle (King County)**

### **William Castillo, Jr., LMHC, SUDP, WSCGC-II, ICGC-I**

(206) 932-6638

Westwood Counseling Services  
1725 Roxbury Avenue SW Suite 5  
Seattle, WA 98106  
Other languages spoken: Spanish

### **Brad Galvin, MS, SUDP, LMHC, LPC, ICGC-II**

(206) 339-4546

Brief Therapy Works  
600 Stewart Street Suite 400  
Seattle, WA 98101  
[www.brieftherapyworks.com](http://www.brieftherapyworks.com)

### **Harumi Hashimoto, MAC, SUDP, LMHC, ICGC-II, BACC**

(206) 695-5968

Asian Counseling & Referral Service  
3639 Martin Luther King Jr Way S  
Seattle, WA 98144  
Other languages spoken: Japanese

### **Phong Ly, ICGC-I**

(206) 774-2443

Asian Counseling & Referral Service  
3639 Martin Luther King Jr Way S  
Seattle, WA 98144

## **Sequim (Clallam County)**

### **Dalis La Grotta, MA, LMHC, WSCGC-I, ICGC-II, BACC**

(360) 797-1429

435 W Bell Street Suite D  
Sequim, WA 98382  
Other languages spoken: Spanish

### **Cathlene Ramsdell, LMFT, ICGC-I**

(360) 808-9620

435 West Bell Street Suite D  
Sequim, WA 98382

## **Spokane (Spokane County)**

### **Craig McElroy, SUDP, WSCGC-II, CAAR**

(509) 838-6092 ext 306

New Horizon Care Centers

701 E 3<sup>rd</sup> Avenue

Spokane, WA 99202

### **Chante Ramirez, SUDP, WSCGC-II**

(509) 838-6092 ext 225

New Horizon Care Centers

701 E 3<sup>rd</sup> Avenue

Spokane, WA 99202

## **Stanwood (Snohomish County)**

### **Darleen Kildow, LMHC, NCC, CMHS, ICGC-I**

(360) 424-4447

Sound Solutions Counseling

PO Box 1531

Stanwood, WA 98292

## **Toppenish (Yakima County)**

### **Gary Cooper, BS, SUDP, WSCGC-I**

(509) 865-5121 ext 4461

Yakama Nation Problem Gambling Program

PO Box 367

Toppenish, WA 98948

## **Tulalip (Snohomish County)**

### **Robin Johnson, SUDP, WSCGC-I**

(360) 716-4302

Tulalip Family Services

2821 Mission Hill Road

Tulalip, WA 98271

### **Sarah Sense-Wilson, MA, LMHC, SUDP, WSCGC-II**

(360) 716-4304

Tulalip Family Services

2821 Mission Hill Road

Tulalip, WA 98271

## **University Place (Pierce County)**

**Kimberly Singh, MA, LMHC, WSGCG-I**

(253) 691-3945

Calming Evolutions

7406 27<sup>th</sup> St W Suite 1

University Place, WA 98466

(Telehealth only)

### **Provisional Providers**

A provisional provider is a treatment provider who does not yet qualify for certification, but has completed the training required for certification and is under the supervision of a Gambling Counselor Clinical Supervisor.

Updated 11/17/22



Appendix H

# **Impact of COVID-19 on Prevalence Study**

## Appendix H – Impact of COVID-19 Pandemic on 2021 Washington State Adult Problem Gambling Prevalence Study<sup>1</sup>

In Spring 2020, the Legislature approved funding for the new Adult Problem Gambling Prevalence study, with the bill language stating that the study was to be completed and the final report delivered by June 30, 2021. However, due to the COVID-19 pandemic, the 2021 Legislature approved a request from the Health Care Authority (HCA) to move the due date and funding authorization forward by one year, to June 30, 2022, with the expectation that the pandemic would abate before the survey was launched. Responsibility for managing all aspects of the project was assigned to the State Problem Gambling Program within the Division of Behavioral Health and Recovery at the Health Care Authority. Although the pandemic had not yet abated and recognizing the likely impacts of conducting the study during the pandemic, HCA/DBHR decided that, rather than lose the appropriated funding (and the opportunity to conduct the survey), the prevalence study data collection should proceed in Summer 2021. The updated prevalence rates of gambling and problem gambling were of paramount importance for the work that the Problem Gambling Task Force (PGTF) would require to complete its legislative mandate.

The size of the effect of the pandemic on the 2021 Washington State Adult Problem Gambling Prevalence Survey findings is unknown at this time, although consideration of impacts identified in other jurisdictions may be helpful. In 2021, Oregon conducted a COVID-impact study on gambling, alcohol use, and other behaviors. In that study, the researchers found that 33% of individuals who gambled changed their gambling frequency (the proportion that decreased their gambling was 1.6 times greater than the proportion that increased their gambling) (Marotta, Yamagata, Irrgang, & Reohr, 2021). In a 2020 study conducted in Australia, gambling participation dropped significantly from April 2019 (pre-pandemic) to May 2020 (during the first three months of the pandemic) (Biddle, 2020). In the 2003 Washington State Household Needs Survey (in which gambling was included), 54% of adult household residents gambled, while 46% did not (Mancuso et al., 2005). In the 2021 Washington State survey, only 43.5% respondents reported gambling, while 56.5% did not.

Listed below are known or suspected impacts of the COVID-19 pandemic that may have affected the survey data:

- All brick-and-mortar facilities<sup>2</sup> including commercial card rooms, Tribal casinos, and horseracing, were closed for several months during the “past 12 months” period asked about in the survey;
- Rates of self-reported online gambling may have increased during the lockdown period for COVID-19, due to the closing of workplaces and more time spent at home and online; and
- Commercial and Tribal brick-and-mortar facilities did not all re-open at the same time. This may have affected the percentage of brick-and-mortar gambling overall, as well as the percentage of adults who gambled in Washington State during the “past 12 months” period (roughly Summer 2020-Summer 2021, depending on when the survey was completed between July and September 2021); and
- Other impacts that may become clearer in the future. Until more COVID-19 gambling impact reports are conducted, the extent of the impact remains an open question.

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<sup>1</sup> Excerpted from the [2021 Washington State Adult Problem Gambling Prevalence Study](#)

<sup>2</sup> Not including locations where lottery tickets can be purchased, such as grocery stores, mini-marts, gas stations, etc. Lottery tickets can be purchased at over 3,600 locations in Washington State but there are no online sales of lottery tickets.

Appendix I

# **Problem Gambling Severity Index**

# APPENDIX I: CALIBRATING THE PROBLEM GAMBLING SEVERITY INDEX (PGSI)<sup>1</sup>

In 1997, several Canadian government agencies with responsibility for addressing problem gambling commissioned a major study to clarify the concept of problem gambling and design a new instrument to measure problem gambling in non-clinical settings. Development of the instrument, called the Canadian Problem Gambling Index (CPGI), involved conducting a large population survey, then re-testing sub-samples of respondents and completing a small number of clinical validation interviews. Many potential items were assembled from various sources and the nine items that were most effective in differentiating non-gamblers, non-problematic regular gamblers and problem gamblers were retained. These nine items constitute the Problem Gambling Severity Index (PGSI), a subset of the larger CPGI. Each of the nine PGSI items, framed in the past 12 months, is scored on a four-point scale (never = 1, sometimes = 2, most of the time = 3, almost always = 4). Conventionally, people scoring 8 or more are classified as problem gamblers. Scores of 3 to 7 indicate 'moderate risk' and scores of 1 or 2 'low risk.' 'Non-problem gamblers' score zero as do non-gamblers who are not administered any of the PGSI questions.

As noted in the body of this report, there has been criticism of the conceptual underpinnings and validity of the SOGS, PGSI, and the DSM-IV, the three most commonly used instruments for assessing problem gambling. Most importantly, there is only fair to weak correspondence between problem gamblers identified in population surveys and the subsequent classification of these same individuals in clinical interviews.<sup>2</sup>

In a large study of 7,272 gamblers (including 977 clinically assessed problem gamblers carried out to re-evaluate the classification accuracy of the SOGS, the PGSI and the NODS, a DSM-IV-based measure, Williams and Volberg (2010, 2014) found that all of the instruments performed well at correctly classifying most non-problem gamblers (i.e., specificity and negative predictive power). The main weakness of the PGSI was that roughly half of the people labeled as problem gamblers by this instrument (using a 3+ criterion) were not classified as problem gamblers by the clinical raters (i.e., low positive predictive power). Many researchers have adopted a cutoff of 3 or more on the PGSI in preference to the cutoff of 8 or more recommended by the instrument's developers because the higher cutoff yielded too few problem gamblers for analysis.

In addition to assessing the classification accuracy of the different problem gambling instruments, different cut-off criteria for problem gambling were evaluated to determine whether improved classification accuracy could be obtained. Table B-1 shows that the PGSI/clinician prevalence ratio is closest to 1 using a 5+ cut-off. The 5+ cut-off also has significantly higher ( $p < .05$ ) specificity, positive predictive power, and diagnostic efficiency (although lower sensitivity) compared to 3+.

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<sup>1</sup> Excerpted from the [2021 Washington State Adult Problem Gambling Prevalence Study \(Appendix B\)](#)

<sup>2</sup> (Abbott, 2001; Abbott & Volberg, 1992; Ferris & Wynne, 2001; Ladouceur et al., 2000; Ladouceur, Jacques, Chevalier, Sévigny, & Hamel, 2005; Murray, Ladouceur, & Jacques, 2005)

**Table B-1: Classification Accuracy of the PGSI Using Different Scoring Thresholds**

	CPGI 3+	CPGI 4+	CPGI 5+	CPGI 6+	CPGI 7+	CPGI 8+
<b>Sensitivity</b>	91.2%	83.1%	<b>74.2%</b>	64.6%	54.3%	44.4%
<b>Specificity</b>	85.5%	92.5%	<b>95.6%</b>	97.6%	98.7%	99.2%
<b>Positive Predictive Power</b>	49.4%	63.1%	<b>72.5%</b>	80.5%	86.6%	89.9%
<b>Negative Predictive Power</b>	98.4%	97.2%	<b>96.0%</b>	94.7%	93.3%	92.0%
<b>Diagnostic Efficiency</b>	86.5%	91.2%	<b>92.7%</b>	93.1%	92.7%	91.9%
<b>Kappa</b>	0.56	0.67	<b>0.69</b>	0.68	0.63	0.55
<b>Instrument Prev/Clinician Prev Ratio</b>	1.85	1.32	<b>1.02</b>	0.80	0.63	0.49

A separate investigation of the PGSI independently found that the performance of the instrument was improved using a cutoff of 5+ (Currie et al., 2013). These investigators noted that the original development of the instrument only tested the problem gambler category for validity with the cutoffs for the remaining categories (non-problem, low-risk, moderate-risk) established without any validity testing. Like Williams and Volberg (2014), Currie and colleagues noted that researchers often use a 3+ cutoff for the CPGI because of the small number of individuals who score 8 or more on the screen, even in very large survey samples.

These researchers conducted a comprehensive assessment of the validity of the PGSI gambler types using data from the CPGI Integrated Dataset (which includes data from prevalence surveys conducted in Alberta, British Columbia, Ontario, Manitoba, Newfoundland, and the national CPGI validation study) (n=14,833 past-year gamblers) and from the Canadian Community Health Survey (CCHS 1.2) (n=18,913 past-year gamblers) (total n=33,746 past-year gamblers). The primary aims of their study were to assess the discriminant validity of the CPGI severity classifications and cutoff scores and to determine the impact of re-calibrating the CPGI scoring rules on the reliability and external validity of these categories.

The researchers examined gambling intensity, game preference, and gambling expenditures to assess the validity of the CPGI severity classifications. Their analysis showed that there were very few statistically significant differences across these dimensions between the low-risk (PGSI=1-2) and moderate-risk (PGSI=3-7) groups. In contrast, the differences between moderate-risk and problem gamblers (PGSI=8+) were very large on nearly all of the dimensions assessed, particularly in gambling expenditures and preferences for EGMs or casino games.

The authors noted that while a major revision of the PGSI may eventually be necessary, a relatively simple way to improve the instrument would be to revise the scoring to increase the distinctiveness of the groups. Although the possibility of merging the categories of low-risk and moderate-risk gambler types was considered, the researchers concluded that a more defensible option was to re-calibrate the categories. Their proposal was to re-score the CPGI to distinguish non-problem gamblers (CPGI=0), low-risk gamblers (CPGI=1-4), moderate-risk gamblers (CPGI=5-7), and problem gamblers (CPGI=8-27) in order to improve the distinctiveness of the groups in relation to gambling intensity and game preference as well as median income spent on gambling. Although the terminology recommended by Currie et al. (2013) is different than the terminology adopted by Williams and Volberg (2014), the preferential cutoff for the CPGI to distinguish problematic gamblers from at-risk gamblers is the same.

## Appendix J

# **Data Sources & Works Cited**

# APPENDIX J: DATA SOURCES & WORKS CITED

## Key Data Sources

- 2021 Survey of Publicly Funded Problem Gambling Services in the United States (2022, known in previous years as the State of the States Report, National Association of Administrators for Disordered Gambling Services)<sup>1</sup>
- 2021 Washington State Adult Problem Gambling Prevalence Study. Volberg, R., 2022, for the WA State Health Care Authority/DBHR, State Problem Gambling Program)<sup>2</sup>
- 2021 Washington State Healthy Youth Survey (2022, WA State agencies: Department of Health, Office of Superintendent of Public Instruction, Health Care Authority/DBHR, Liquor and Cannabis Board)<sup>3</sup>
- American Community Survey data (based on 2020 Census)<sup>4</sup>
- Evergreen Council on Problem Gambling (website and materials)<sup>5</sup>
- Land-based gambling locations (excluding Lottery point-of-sale) (WA State Gambling Commission—Organizational Licensees)<sup>6</sup>
- Other jurisdictions' Problem Gambling Program websites, materials, and staff<sup>7</sup>
- Roster of Certified Gambling Counselors and Locations in WA State (as of Dec 2022--Evergreen Council on Problem Gambling)<sup>8</sup>
- Supporting Responsible Gaming website (WA Indian Gaming Association)<sup>9</sup>
- Washington state agencies (websites, including online data sources, staff, and other materials)<sup>10</sup>

## Additional References (by topic)

### ***Certified Gambling Counselor Certification***

Certified Gambling Counselor Manual (May 2022): <https://www.evergreencpg.org/wp-content/uploads/2022/05/Certification-Manual-2022-Fillable-Final.pdf>

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<sup>1</sup> [https://naadgs.org/wp-content/uploads/2022/06/NAADGS\\_2021\\_Survey\\_of\\_Publicly\\_Funded\\_Problem\\_Gambling\\_Services\\_in\\_the\\_United\\_States\\_v2.pdf](https://naadgs.org/wp-content/uploads/2022/06/NAADGS_2021_Survey_of_Publicly_Funded_Problem_Gambling_Services_in_the_United_States_v2.pdf)

<sup>2</sup> <https://www.hca.wa.gov/assets/program/wa-state-adult-problem-gambling-prevalence-study-final-2021.pdf>

<sup>3</sup> <https://www.askhys.net/>

<sup>4</sup> <https://www.census.gov/programs-surveys/acs>

<sup>5</sup> <https://www.evergreencpg.org/>

<sup>6</sup> <https://www.wsgc.wa.gov/licensing/search-license/licensees>

<sup>7</sup> Consult the website for the National Assoc. of Administrators for Disordered Gambling Services for specific State program contacts: <https://naadgs.org/state-services/>

<sup>8</sup> [https://www.evergreencpg.org/help-and-hope/treatment\\_services/counselor-directory/](https://www.evergreencpg.org/help-and-hope/treatment_services/counselor-directory/)

<sup>9</sup> WIGA w/ links to Tribal webpages and services offered: <https://www.washingtonindiangaming.org/issues/supporting-responsible-gaming/>

<sup>10</sup> See website for each individual agency. For a list of agency websites: <https://wa.gov/agency>

WA State Gambling Counselor Certification Committee (WSGCCC) webpage:  
<https://www.evergreencpg.org/training/counselor-certification/washington-state-gambling-counselor-certification-committee/>

Washington State Department of Health – Health Care Provider Credential Database (accessed 10/20/2022: [data.wa.gov](http://data.wa.gov)).

### ***Clinical and access to treatment in WA State***

Kelly TM, Daley DC. Integrated treatment of substance use and psychiatric disorders. *Soc Work Public Health*. 2013;28(3-4):388-406. doi: 10.1080/19371918.2013.774673. PMID: 23731427; PMCID: PMC3753025.

Northwest Indian Treatment Center (Squaxin Tribe): NWITC – Squaxin Island Tribe<sup>11</sup>

Soberay A, Faragher JM, Barbash M, Brookover A, Grimsley P. Pathological gambling, co-occurring disorders, clinical presentation, and treatment outcomes at a university-based counseling clinic. *J Gambl Stud*. 2014 Mar;30(1):61-9. doi: 10.1007/s10899-012-9357-2. PMID: 23297170.

SAMHSA’s Working Definition of Recovery: Substance Abuse and Mental Health Services Administration (SAMHSA) Brochure (PEP12-RECDEF) (accessed 12/15/22)

Problem gambling treatment agencies in Washington with state contracts (October 2022):  
<https://www.hca.wa.gov/assets/program/problem-gambling-treatment-agencies.pdf>

State Problem Gambling Program—Division of Behavioral Health and Recovery/Health Care Authority<sup>12</sup>

WA Tribes Care - Washington Indian Gaming Association: webpage with links to Tribal webpages and services offered <https://www.washingtonindiangaming.org/issues/supporting-responsible-gaming/>

Welte JW, Barnes GM, Tidwell MO, Hoffman JH, Wiczorek WF. The Relationship Between Distance from Gambling Venues and Gambling Participation and Problem Gambling Among U.S.. *J Gambl Stud*. 2016 Dec;32(4):1055-1063. doi: 10.1007/s10899-015-9583-5. PMID: 26615561.

### ***Gambling Diversion Court***

New Jersey Considers Specialized Court for Gambling Addicts. *The Crime Report*—online article published 10/10/22. <https://thecrimereport.org/2022/10/10/new-jersey-considers-specialized-court-for-gambling-addicts/>

Seeley, M. Ohio Explores Diversion Court for Problem Gamblers Who Commit Crimes. *Ohbets.com*—online article published 3/2/22. *Ohbets.com*. <https://www.ohbets.com/ohio-explores-diversion-court-problem-gamblers/>

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<sup>11</sup> <https://squaxinland.org/northwest-indian-treatment-center/>

<sup>12</sup> <https://www.hca.wa.gov/free-or-low-cost-health-care/i-need-behavioral-health-support/problem-gambling#:~:text=For%20the%20Washington%20State%20Problem,%2D800%2D547%2D6133.>



### ***Joint Legislative Problem Gambling Task Force (active 2020-2022)***

Problem Gambling Task Force (PGTF) | staffed by the Washington State Health Care Authority:  
<https://www.hca.wa.gov/about-hca/programs-and-initiatives/behavioral-health-and-recovery/problem-gambling-task-force-pgtf>

**Medicaid:** WA State –Kaiser Family Foundation (Oct 2022) <https://files.kff.org/attachment/fact-sheet-medicare-state-wa>

**Problem Gambling Helpline:** 1-800-547-6133 chat/text/call. Evergreen Council on Problem Gambling <https://www.evergreencpg.org/help-and-hope/programs-and-services/helpline-info/>

### ***Recovery support***

WA State Health Care Authority -- Recovery Support website<sup>13</sup>:

About Us – Washington Recovery Alliance<sup>14</sup>

### ***Responsible Gaming***

American Gaming Association -- Responsible-Gambling-Regulations-WEB.pdf  
(americangaming.org)

International Center for Responsible Gaming

NASPL-NCPG Responsible Gambling Verification program for lottery organizations:  
<https://www.ncpgambling.org/programs-resources/responsible-gambling/naspl-rgv/>

LaPlante DA, Gray HM, LaBrie RA, Kleschinsky JH, Shaffer HJ. Gaming industry employees' responses to responsible gambling training: a public health imperative. *J Gambl Stud.* 2012 Jun;28(2):171-91. doi: 10.1007/s10899-011-9255-z. PMID: 21656199.

Supporting Responsible Gaming – WA Indian Gaming Association<sup>15</sup>

WALottery – Responsible Play website 'Keep It Fun' : [Washington's Lottery \(walottery.com\)](http://www.walottery.com)

### ***Statewide Self-Exclusion Programs in WA State (State agency-run)***

Statewide Voluntary Self-Exclusion Program (House-banked card rooms) | Washington State Gambling Commission: <https://www.wsgc.wa.gov/self-exclusion>

WA Lottery Voluntary Self-Exclusion Program:

<https://www.walottery.com/responsibility/SelfExclusion.aspx#:~:text=You%20can%20enroll%20in%20the,your%20driver%27s%20license%20or%20passport.>

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<sup>13</sup> <https://www.hca.wa.gov/free-or-low-cost-health-care/i-need-behavioral-health-support/what-recovery-support>

<sup>14</sup> [washingtonrecoveryalliance.org/about-us/#:~:text=The%20WRA%20is%20a%20community,health%20conditions%2C%20and%20community%20organizations.](http://washingtonrecoveryalliance.org/about-us/#:~:text=The%20WRA%20is%20a%20community,health%20conditions%2C%20and%20community%20organizations.)

<sup>15</sup> WIGA webpage with links to Tribal webpages and services offered:  
<https://www.washingtonindiangaming.org/issues/supporting-responsible-gaming/>

***WA State laws and statutes***

RCW 41.05.750 – Problem and pathological gambling treatment program<sup>16</sup>

RCW 41.05.751 – Problem gambling account<sup>17</sup>

RCW 67.70.340(3) (a)(b) – Transfer of shared game lottery proceeds (Lottery)<sup>18</sup>

RCW 9.46.228 – Gambling Activities under 18<sup>19</sup>

WAC 182-100-0100 – Problem gambling and gambling disorder treatment (State PG Pgm)<sup>20</sup>

WAC 246-341-0754 – Outpatient services – Problem gambling and gambling disorder services<sup>21</sup>

WAC 230-23-030 – Licensee responsibilities<sup>22</sup>

ESHB 1031 (Chapter 369, Laws of 2005)-- Special Notice (Washington state Dept. of Revenue)<sup>23</sup>

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<sup>16</sup> <https://app.leg.wa.gov/rcw/default.aspx?cite=41.05.750>

<sup>17</sup> <https://app.leg.wa.gov/rcw/default.aspx?cite=41.05.751>

<sup>18</sup> <https://apps.leg.wa.gov/rcw/default.aspx?cite=67.70.340>

<sup>19</sup> <https://app.leg.wa.gov/RCW/default.aspx?cite=9.46.228>

<sup>20</sup> <https://app.leg.wa.gov/wac/default.aspx?cite=182-100-0100>

<sup>21</sup> <https://app.leg.wa.gov/wac/default.aspx?cite=246-341>

<sup>22</sup> <https://app.leg.wa.gov/WAC/default.aspx?cite=230-23-030>

<sup>23</sup> [https://dor.wa.gov/sites/default/files/2022-02/sn\\_05\\_gambling.pdf](https://dor.wa.gov/sites/default/files/2022-02/sn_05_gambling.pdf)

Appendix K

# **ECPG Glossary**

## Glossary of common Gambling and Gaming Terminology

**NOTE:** The following is not intended to be an exhaustive listing of gambling and gaming terminology. The glossary does not include definitions of specific casino or online games such as Blackjack, Roulette, Poker, League of Legends, DOTA 2, etc.). The terms here do relate to gambling and gaming as well as behaviors and treatment terminology for gambling disorder.

**Action:** To have, or be in, **action** means you have a monetary interest in the outcome of an event.

**Action game:** A game genre emphasizing physical challenges, hand–eye coordination and reflexes. It includes fighting games, [shooters](#), and [platformers](#).

**Avatar:** The player's representation in the game world.

**Balance:** Aspects of a multi-player game that keep it fair for all players. The issue of 'balanced' [gameplay](#) is a heavily-debated matter among most games' player communities.

**Badge:** Also, **achievement**. An indicator of accomplishment or skill, showing that the player has performed some particular action within the game.

**Battle pass:** A type of in-game monetization that provides additional content for a game through a tiered system, rewarding the player with in-game items by playing the game and completing specific challenges.

**Bailout:** Money given to a gambler that allows him/her to pay debts without suffering adverse consequences.

**Button mashing:** The pressing of different button combinations in rapid succession to perform or attempt to perform special moves. This technique is most often encountered in [fighting games](#).

**Chasing:** The attempt by a gambler to make up previous losses through additional gambling, a common symptom of a pathological gambler. Chasing often involves making larger bets and/or taking greater risks. Appears as the 6<sup>th</sup> [diagnostic criteria of Gambling Disorders](#) in the DSM-5, "After losing money gambling, often returns another day to get even ('chasing' one's losses)."

**Cognitive behavioral therapy:** An approach to treatment that extends behavioral therapy to the modification of cognitive processes such as self-image and fantasy.

**Cognitive distortions:** Faulty thinking, as when gamblers "know" their luck is about to change.

**Cognitive therapy:** A treatment method focusing on changing an individual's inaccurate beliefs. Cognitive therapy for a gambler might involve challenging the patient's perceived odds of winning or ability to control the outcome.

**Comorbidity:** The presence of multiple disorders in one individual. Pathological gambling has high rates of comorbidity with disorders such as alcoholism and depression.

**Compulsive gambling:** A term used commonly to describe compulsive gambling behavior or addiction but is not a diagnosis. Used by [Gamblers Anonymous](#) and some non-profits.

**Compulsion loop:** A cycle of [gameplay](#) elements designed to keep the player invested in the game, typically through a feedback system involving in-game rewards that open up more gameplay opportunities.

**Continue:** A common term in video games for the option to continue the game after all of the player's [lives](#) have been lost, rather than ending the game and restarting from the very beginning. There may or may not be a penalty for doing this, such as losing a certain number of points or being unable to access bonus stages. In more modern times, continues have also been used in a number of [free-to-play](#) games, especially [mobile games](#), where the player is offered a chance to pay a certain amount of premium currency to continue after failing or losing. An example of this would be [Temple Run 2](#), where the price of a continue doubles after each failure, with an on-the-fly [in-app purchase](#) of the game's premium currency if required.

**DeTur (Desensitization of Triggers and Urge Reprocessing):** Created by A. J. Popky, it is an EMDR-related technique that uses bilateral stimulation – side to side movements – to reduce an individual's level of urge (LOU) to engage in an addictive behavior. It has been used in the treatment of gambling disordered individuals.

**Digital Gaming:** Playing a game on a digital device, including PC's, consoles, mobile phones, etc.

**DSM-5:** Diagnostic and Statistical Manual of Mental Disorders, 5<sup>th</sup> Edition, written by the American Psychiatric Association. The fifth edition was published in May 2013. A notable change from DSM-IV to DSM-5 is that Pathological Gambling was changed to Gambling Disorder and moved to the Substance Use and Addictive Disorders section.

**EGM:** Electronic Gambling Machines

**Electronic sports (esports):** Also, **competitive gaming**, **cybersports** and **professional gaming**. Organized competitions around competitive video games, typically using games from the [first-person shooter](#) and [multiplayer online battle arena](#) genres, and often played for prize money and recognition.

**Eye Movement Desensitization and Reprocessing (EMDR):** A form of psychotherapy created by Francine Shapiro in the 1980s that uses eye movements or other forms of bilateral stimulation to help the processing of addictive urges and traumatic memories. EMDR makes urges/memories less triggering/bothersome (“desensitizes” them), then restructures the neural networks associated with the urges and traumatic memories so that they are linked with positive associations, such as a satisfying life of recovery or a new, healthy insight about a traumatic experience (“reprocesses” them). Once an addictive urge or traumatic memory has been processed using EMDR, it typically no longer negatively impacts a person’s life.

**Farming:** Repeating a battle, quest, or other part of a game in order to receive more or duplicates of specific reward items that can be gained through that battle or quest, such as [experience points](#), game money, or specific reward items. [Gold farming](#) is a type of farming done for in game currency. See [grinding](#).

**Freemium Gaming:** “freemium” is used to describe games that are free to play but require money to unlock certain features. These features can include anything from customization options to large amounts of in-game currency. In recent years, video games that use the freemium model have become increasingly popular, especially on the mobile platform.

**Free-to-play (F2P or FtP):** Games that do not require purchase from a retailer, either physical or digital, to play. Wildly prevalent amongst smartphone apps, free-to-play games may also provide additional gameplay-enhancing purchases via an [in-app purchase](#). (Compare 'freemium', a free-to-play game that follows such a model.)

**Gam-Anon:** A fellowship for the families of disordered gamblers (problem and pathological gamblers) with chapters throughout North America.

**GA (Gamblers Anonymous):** An international network of groups for people attempting to recover from disordered gambling (problem and pathological gambling). Gamblers Anonymous is a 12-step program modeled after Alcoholics Anonymous. Local chapters provide fellowship in which people share their experiences, support, and hopes of recovery.

**GA-20 (The Gamblers Anonymous 20 Questions):** The ‘GA-20’ is a list of 20 questions devised by Gamblers Anonymous to help an Individual decide if they have a gambling problem. According to GA, most people with gambling problems will answer “yes” to at least seven of the 20 questions.

**Gambling – RCW definition:** “Gambling,” as used in this chapter, means staking or risking something of value upon the outcome of a contest of chance or a future contingent event not under the person's control or influence, upon an agreement or understanding that the person or someone else will receive something of value in the event of a certain outcome. Gambling does not include fishing derbies as defined by this chapter, pari-mutuel betting and handicapping contests as authorized by chapter [67.16](#) RCW, bona fide business transactions valid under the law of contracts, including, but not limited to, contracts for the purchase or sale

at a future date of securities or commodities, and agreements to compensate for loss caused by the happening of chance, including, but not limited to, contracts of indemnity or guarantee and life, health, or accident insurance. In addition, a contest of chance which is specifically excluded from the definition of lottery under this chapter shall not constitute gambling. (RCW 9.46.0237)

**Gambling Disorder/Disordered Gambling:** The term used in the [DSM-5](#) to describe and diagnose an addiction to gambling. There is a total of 9 diagnostic criteria and a diagnosis is categorized as mild by meeting 4 or 5 criteria, moderate by meeting 6 or 7 criteria, or severe by meeting 8 or 9 criteria. An individual who meets 1 to 3 criteria may be said to have “problem gambling” but does not receive any diagnosis. “Problem gambling” is NOT a diagnosis.

**Gaming:** Can either mean 1. Gambling. 2. The playing of games developed to teach something or to help solve a problem, as in a military or business situation. 3. The playing of computer or video games.

**Gaming – Within the meaning of [IGRA](#):**

1. **Class I Gaming:** means social games solely for prizes of minimal value or traditional forms of Indian gaming engaged in by individuals as a part of, or in connection with, tribal ceremonies or celebrations.
2. **Class II gaming:** (i) the game of chance commonly known as bingo (whether or not electronic, computer, or other technologic aids are used in connection therewith)—
  - (ii) card games that—
    - (I) are explicitly authorized by the laws of the State, or
    - (II) are not explicitly prohibited by the laws of the State and are played at any location in the State, but only if such card games are played in conformity with those laws and regulations (if any) of the State regarding hours or periods of operation of such card games or limitations on wagers or pot sizes in such card games.
3. **Class III gaming:** means all forms of gaming that are not class I gaming or class II gaming.

**Harm Reduction:** The application of methods designed to reduce the harm (and risk of harm) associated with ongoing addictive behaviors.

**In-app purchase (IAP):** A [microtransaction](#) in a [mobile game](#) (or regular [app](#)), usually for [virtual goods](#) in free or cheap games.

**Internet Gambling/Gaming:** Gambling or gaming on a game hosted on an internet platform. (for more on video game terms, visit Wikipedia’s [Glossary of video game terms](#).)

**Internet vs. Intranet vs. Extranet:** An intranet is a private network, operated by a large company or other organization, which uses internet technologies, but is insulated from the global internet. An extranet is an intranet that is accessible to some people from outside the company, or possibly shared by more than one organization.

**Loot box:** Loot boxes (and other name variants such as booster packs for online collectible card games) are awarded to players for completing a match, gaining an experience level, or other in-game achievement. The box contains random items, typically cosmetic-only but may include gameplay-impacting items, often awarded based on a rarity system. In many cases, additional loot boxes can be obtained through [microtransactions](#).

**Loot system:** Methods used in multiplayer games to distribute treasure among cooperating players for finishing a quest. While early MMOs distributed loot on a 'first come, first served' basis, it was quickly discovered that such a system was easily abused, and later games instead used a 'need-or-greed' system, in which the participating players roll virtual dice and the loot is distributed according to the results.

**MMOG:** Massively Multiplayer Online Game

**Neurotransmitter:** A chemical substance that naturally occurs in the brain and is responsible for communication among nerve cells.

**Online game:** A game where part of the [game engine](#) is on a server and requires an Internet connection. Many [multiplayer](#) games support online play.

**On-premise mobile device gambling/Gaming:** on-premise gambling is online gambling restricted to the confines of a specific geographic area. In the case of the casino industry it is the restriction of gambling game content within the confines of the casino(premises). The primary delivery vehicle for on-premise gambling is a mobile device such as a phone or tablet either owned by the player or provided by the casino for use within casino premises

**Pari-Mutuel Wagering (also known as 'off-track betting'):** A betting system in which all bets of a particular type are placed together in a pool; taxes and the 'house take' are removed, and payoff odds are calculated by sharing the pool among all winning bets (used in gambling on horse racing, greyhound racing, jai alai, and all sporting events of relatively short duration in which participants finish in a ranked order. A modified pari-mutuel system is also used in some lottery games).

**Pathological gambling:** The [American Psychological Association's](#) clinical diagnostic term for Gambling Disorder prior to the publication of DSM-5 in May 2013. This term is usually limited to cases where the gambling causes serious damage to a person's social, vocational, or financial life; often referred to as compulsive gambling and disordered gambling.

**Perks:** Special bonuses that video game players can add to their characters to give special abilities. Similar to [power ups](#), but permanent rather than temporary.

**Platform:** The specific combination of electronic components or [computer hardware](#) which, in conjunction with [software](#), allows a video game to operate.



**Prevalence:** The proportion of a population having a condition at a given point in time or over a fixed period of time.

**Proc:** "Proc" and "proccing" is used to describe the activation or occurrence of a random gaming event. Particularly common for [massively multiplayer online games](#), procs are random events where special armor or weapons provide the user with temporary extra powers, or when the opposing enemy suddenly becomes more powerful in some way.

**Professional gambling:** One who gambles as a way to make part or all of his/her living. Is often sponsored and generally does not exhibit life problems as a result of their gambling. Professional gamblers can, however, lose control and exhibit chasing behavior, at which time they may begin exhibiting signs of gambling disorder.

**Problem Gambling:** An urge to gamble continuously despite harmful negative consequences or a desire to stop. Problem gambling is often defined by whether harm is experienced by the gambler or others, rather than by the gambler's behavior.

**Rage game:** A video game which is designed to be extremely difficult and frustrating, with elements that intentionally try to 'cheat' in some way or form, with the intent of causing a player to become extremely angry and rage quit.

**Rage quit:** Rage quitting is the act of quitting a game mid-progress instead of waiting for the game to end. Typically, this is associated with leaving in frustration, such as unpleasant communication with other players, being annoyed, or losing the game. However, the reasons can vary beyond frustration, such as being unable to play due to the way the game has progressed, bad sportsmanship, manipulating game statistics, or having network connection problems. There are also social implications of rage quitting, such as making other players rage quit. Rage quitting is considered improper and rude but can also be considered amusing by others when they are not negatively impacted by it themselves. Contrast with [drop-in, drop-out](#).

**Responsible Gaming/Gambling:** the set of [social responsibility](#) initiatives by the [gambling](#) industry—including governments and [gaming control boards](#), operators (such as [casinos](#)), and vendors—to ensure the integrity and fairness of their operations and to promote awareness of harms associated with gambling, such as [gambling addiction](#). The terms “responsible gambling” and “responsible gaming” are generally used interchangeably.

**Season pass:** A purchase made in addition to the cost of the base game that generally enables the purchaser access to all [downloadable content](#) that is planned for that title without further cost.

**Self-exclusion Programs:** Programs that provide a way for people to voluntarily ban themselves from a casino or other gambling establishments in order to deal with gambling problems. The

programs may be mandated by the government or voluntarily established by casinos and other gaming operators. The gaming operator agrees to remove the self-excluded person from its direct mail lists and to revoke privileges for gaming services such as player club/card privileges and on-site check-cashing. [Self-exclusion](#) programs are available in the US, the UK, Canada, Australia, South Africa, and other countries.

**Social gambling:** Gamblers who exhibit few or none of the difficulties associated with problem or pathological gambling. Social gamblers will gamble for entertainment, typically will not risk more than they can afford, often gamble with friends, gamble for limited periods of time, and are not preoccupied with gambling. Often used interchangeably with the term “recreational gambling”.

**Social Gaming:** Generally refers to tabletop or video games that allow or require [social interaction](#) between players as opposed to games played in solitude.

**[South Oaks Gambling Screen \(SOGS\):](#)** A series of questions used to determine the presence of a gambling problem. Developed by Henry Lesieur and Sheila Blume of the South Oaks Psychiatric Hospital, the instrument consists of 20 items, with a score of five or higher considered evidence of pathological gambling. The South Oaks Gambling Screen has been the most widely used instrument in assessing the prevalence of pathological gambling among the general public, though it has not been specifically validated for that use.

**[SOGS-RA \(South Oaks Gambling Screen – Revised for Adolescents\):](#)** A modified version of the South Oaks Gambling Screen used in assessing adolescents.

**Steam:** a video game [digital distribution](#) service by [Valve](#). It was launched as a standalone software client in September 2003 as a way for Valve to provide automatic updates for their games, and expanded to include games from third-party publishers. Steam has also expanded into an online web-based and mobile digital storefront. Steam offers [digital rights management](#) (DRM), server hosting, [video streaming](#), and [social networking services](#). It also provides the user with installation and automatic updating of games, and community features such as friends lists and groups, [cloud storage](#), and in-game voice and chat functionality. The Steam platform is the largest digital distribution platform for [PC](#) gaming, holding around 75% of the market space in 2013.<sup>[4]</sup> By 2017, users purchasing games through Steam totaled roughly US\$4.3 billion, representing at least 18% of global PC game sales.<sup>[5]</sup> By 2019, the service had over 34,000 games with over 95 million monthly active users. The success of Steam has led to the development of a line of [Steam Machine microconsoles](#), which include the [SteamOS operating system](#) and [Steam Controllers](#).

**Tilt:** A term used by gamblers/gamers to refer to the process of losing control over gambling/gaming. **Tilt** originated as a poker **term** for a state of mental or emotional confusion or frustration in which a player adopts a less than optimal strategy, usually resulting in the

player becoming over-aggressive. ... **Tilting** in esports causes players to "lose control due to anger".

**Twelve-step program:** A program for treating an addiction, based on the 12 steps first espoused by Alcoholics Anonymous.

**Twitch:** A video [live streaming](#) service operated by Twitch Interactive, a subsidiary of [Amazon](#).<sup>[2]</sup> Introduced in June 2011 as a spin-off of the general-interest streaming platform, [Justin.tv](#), the site primarily focuses on [video game live streaming](#), including broadcasts of [esports](#) competitions, in addition to music broadcasts, creative content, and more recently, "[in real life](#)" streams. Content on the site can be viewed either live or via [video on demand](#). By 2015, Twitch had more than 1.5 million broadcasters and 100 million viewers per month.<sup>[6]</sup> As of 2017, Twitch remained the leading live streaming video service for video games in the US, and had an advantage over [YouTube Gaming](#). As of May 2018, it had 2.2 million broadcasters monthly and 15 million daily active users, with around a million average [concurrent users](#). As of May 2018, Twitch had over 27,000 partner channels.

**Video Gaming:** An [electronic game](#) that involves interaction with a [user interface](#) to generate visual feedback on a two- or three-dimensional [video display device](#) such as a [touchscreen](#), [virtual reality headset](#) or [monitor/TV set](#). Since the 1980s, video games have become an increasingly important part of the [entertainment industry](#), and whether [they are also a form of art](#) is a matter of dispute.

**Video poker:** A [casino game](#) based on [five-card draw poker](#). It is played on a computerized console similar in size to a [slot machine](#).

**Whale:** In [free-to-play](#) games, a user that spends a considerable amount of real-world money for in-game items, rather than acquiring said items through grinding or playing the game normally. These players are typically seen as the largest segment for revenue production for free-to-play titles. "White whales" may also be used to describe exceptionally high spenders. Borrowed from gambling jargon; a 'whale', in that context, is a person who makes extravagant wagers or places reckless bets.

**YouTube bait:** Games that are made for an audience; games created with [YouTubers](#) or [Twitch streamers](#) in mind.

For more on video game terms, visit: Wikipedia's [Glossary of video game terms](#).

For more on gambling terms visit: gambling.net's [Gambling Glossary: A Guide to Gambling Terms](#), or the OnlineGambling.ca's [Gambling Terminology – Terms Relating to Gambling](#).

For more on problem gambling terms visit: North American Association of State and Provincial Lotteries' [Terms Related to Problem Gambling](#).

## Appendix L

# **ECPG Additional Resources**

*Problem Gambling Helplines*

*Increasing Number of Certified  
Gambling Counselors*

*International, National & State-Level  
Gambling Counselor Certification &  
Training Programs*

*Establishing On-Site Kiosks*

*Responsible Gaming Training for  
All Commercial Venues*

*Youth Prevention Needs*

## **A comparison of the Problem Gambling Helpline with other helplines, service considerations, and enhancement plans**

*Written by Evergreen Council on Problem Gambling per HCA's request for recommendations from subject matter experts.*

Even with the high prevalence for common mental health conditions and their relationship to Gambling Disorder; and with the increasing awareness of the need to promote and offer strong mental health services, both awareness of and access to public health services in these areas remains challenging.

Phone helplines continue to be among the most accessible ways for people to connect with a counselor and get the assistance they need. In Washington State, callers may access problem gambling services and referrals through several helpline options:

- The Evergreen Council on Problem Gambling's Washington State Helpline: 1-800-547-6133
- The Washington Recovery Help Line: 1-866-789-1511
- The National Problem Gambling Helpline: 1-800-GAMBLER and 1-800-522-4700

The Evergreen Council on Problem Gambling's Washington State Helpline has been running for more than 25 years and, for more than a decade, received state funding support.

The Division of Behavioral Health and Recovery (DBHR), in 2011, consolidated its helpline services contracts for mental health, alcohol and drug, and problem gambling into one integrated helpline service for behavioral health through the Washington Recovery Help Line. The Health Care Authority Problem Gambling services lists the following resources for people seeking helpline services:

- **For a life-threatening emergency:** Call 911.
- **For suicide prevention:** Contact the [National Suicide Prevention Lifeline](#) at 1-800-273-8255 (TRS: 1-800-799-4889).
- **For 24-hour emotional support and referrals:** Contact the [Washington Recovery Help Line](#) or the [mental health crisis line](#) in your area.
- **For the Washington State Problem Gambling Helpline:** 1-800-547-6133.

Having multiple helpline services can help meet the needs of more people throughout Washington. Regardless of the Helpline Service, it is crucial that we consistently strive to offer best practices and equitable services to meet the needs of every resident in Washington State. So, we asked the question: How can we enable problem gambling helplines to support more people and be more effective? And we recognize that we must be realistic about our limitations.

**Location, Location, Location**

Because of 911 services throughout the country, many people believe that all Helplines can identify a caller's location immediately. This is simply not the case. There are limitations based on whether the call is coming from a landline or a wireless device. And there are additional limitations based on whether the called is answered via standard 911 or Enhanced 911 capabilities.

For Helpline Calls to a Call Center for purposes other than 911 calls, there are even more limitations, because the FCC certification for specialized call service location enhancements applies currently only to 911 emergency calls.

Currently, landline calls may use a Geographic Information System (GIS) to help pinpoint locations. Wireless calls require that the Helpline coordinate with phone carriers to determine more accurate location of the caller through a "ping" triangulation telephone switch system.

Even Enhanced 911, which uses a national database, has limitations because the database isn't always accurate, and it only works with landlines.

For Problem Gambling Call Centers across the United States, these 911-style call services and enhanced capabilities are not yet available. Most are limited to identifying the caller by the area code. While this may be accurate for landline calls, it is problematic when mobile phone users may carry their cell phone number with them when they travel or move to another state. So Helpline Specialists may still have to ask for desired service/referral location and transfer a call at least once.

### **Awareness and Promotion of Helpline(s)**

Even with the high prevalence for common mental health conditions and their relationship to Gambling Disorder; and with the increasing awareness of the need to promote and offer strong mental health services, both awareness of and access to public health services in these areas remains challenging.

Whenever the Evergreen Council on Problem Gambling and the Washington State Division of Behavioral Health and Recovery, Health Care Authority, State Problem Gambling Program and our partners are able to fund statewide awareness campaigns with the State Problem Gambling Number, the number of calls to the Helpline spike. We know that we need to use both traditional media and digital/social media outlets on a more consistent and continuing basis to keep awareness of the Helpline and the treatment and support services available in Washington front of mind. Current funding levels to support these awareness efforts do not meet the need for year-round awareness campaigns.

### **Current Service Considerations**

Just as we are striving to improve Helpline services in Washington, the National Council on Problem Gambling (NCPG) is also currently working to improve its National Problem Gambling Helpline Network, of which ECPG's Washington State Problem Gambling Helpline is one of more than 25 members. NCPG is in the process of reviewing best practices for Helpline Services to determine/implement improvements (including staffing, training, protocols, data collection, response time, helpline staff training, and revised call center standards). The Evergreen Council

on Problem Gambling in Washington State will be a participant in this effort and will use this information to support best practices for the Washington State Problem Gambling Helpline.

Because ECPG's Helpline is staffed by the same Helpline Call Center as the NCPG Helpline, we benefit from this collaborative relationship. ECPG pays not only for the Helpline services and calls to the Washington State Helpline, but we also pay for any calls to the NCPG Helpline that come in from Washington State.

This is one area that both the National and State Helplines are working to address. Currently, as mentioned in the introduction to this report, all calls are identified using the caller's area code. In today's world, this is problematic, because mobile phone numbers follow a person when they move from state to state unless they choose to change them. This makes the use of the caller's area code antiquated and not always accurate for providing referral to services.

With this in mind, NCPG is researching the feasibility of pursuing an FCC certification as an emergency service for the National Helpline Number. This is the only way a Helpline can identify individual callers based on calling location rather than area code.

The results from this feasibility research will help inform any changes that might be made at the state level.

The Evergreen Council on Problem Gambling is one of several states and the National Council on Problem Gambling that contract with the Louisiana Association on Compulsive Gambling's Helpline Call Center for services. LACG was the first Problem Gambling Helpline in the United States with a national accreditation and was used as a pilot program to examine proper guidelines for future accreditations with other problem gambling helplines. LACG became a Suicide Prevention Lifeline Network provider in October 2018.

Services for which ECPG contracts to support the Washington State Problem Gambling Helpline include:

- 24/7 – 365 days a year Helpline services call center. No Helpline Specialist (HLS) ever answers at home or handles a crisis call alone. HLS team answers calls in less than a minute – striving for a 3-ring system, and all calls are answered with a live person.
- All HLS are expected to receive a minimum of 80% score on the CRISIS Helpline Specialist Certification and CALM (Counseling on Access to Lethal Means) certification. All HLS are experienced in the ASIST (Applied Suicide Intervention Skills Training) education. LACG conducts mandatory in-service trainings regularly in 60- to 90minute sessions. These include a wide variety of training topics, including Problem Gambling, Gambling Disorders, and Co-occurring Disorders; Domestic Violence training; Confidentiality/HIPAA Laws and Guidelines, etc.)
- LACG has licensed/certified Clinicians on-call 24/7/365 to assist HLS when fielding a crisis call of any kind.

ECPG’s Washington State Problem Gambling Helpline, and the National Helpline, both offer text and chat services, which enable those who are gambling online or on their mobile phones to access help.

### **Washington State Problem Gambling Helpline Enhancement Plans - 2022-2024:**

#### **1. Add interactive directory map to include**

- i. List of Certified Gambling Counselors/agencies and description of services provided, including insurances accepted, languages spoken, telehealth/in-person services, supported by State Problem Gambling Program funding;
- ii. Gaming treatment providers (International Gaming Disorder Certificate credential (IGDC);
- iii. Screening and Referral locations (facilities dedicated to providing free in-person, walk-in, gambling/gaming brief screening and referral resources.

Design collateral materials promoting the interactive directory map using digital (emails and website), social media, and direct mail.

#### **2. Complete research to implement a warm transfer process for calls to the Washington State Problem Gambling Helpline (1-800-547-6133).**

The process of assisting another person experiencing mental health symptoms is a profoundly *human* endeavor. When appropriate and needed, the Helpline Specialists will make a “warm transfer” to a Certified Gambling Counselor and/or Certified Peer Specialist/Recovery Coach on call in Washington State. This allows callers the opportunity to speak directly with a trained counselor or an individual in recovery with lived experience in understanding possible next steps to move forward with support. Clinicians will be able to make follow-up calls to track individuals who follow through with an appointment for services. In addition to continuing education required for their licensure and certification, these on-call specialists will be required to take ASIST (Applied Suicide Intervention Skills Training).

#### **3. Work with NCPG and monitor changes and enhancements through NCPG’s National Problem Gambling Helpline Modernization Project (2022-2024) that may benefit or otherwise impact Helpline Services in Washington State. Areas proposed to be addressed include:**

- Improved Technology
- Quality Improvement through Call Center Support
- Reliable, Useful Data Collection (identify State and National Trends)
- Improved Utilization of Services



## Increasing Number of Certified Gambling Counselors

*Written by Evergreen Council on Problem Gambling per HCA's request for recommendations from subject matter experts.*

There are approximately 4,250<sup>1</sup> active licensed Substance Use Disorder Professionals in the state of Washington according to the Washington State Department of Health. And there are thousands of licensed mental health providers (including LMHCs, MSWs, Psychologists, etc.). Despite this large number of clinical professionals in WA State, only 30-40 are Certified Gambling Counselors (CGCs). Based on WAC, CGCs are the only state-certified specialists who can treat individuals impacted by problem gambling/Gambling Disorder (DSM-5).<sup>2</sup> Based on the 2021 WA State Adult Problem Gambling Prevalence Study, 3.5% of those who gambled in the past year could be classified as being at a moderate-to-severe risk for problem gambling. In WA State, this represents an estimated 66,000 to 108,000 adults could be at moderate-to-severe risk for problem gambling, (for an average of 90,000), with 1 in 10 that may seek services. And an additional 397,000 to 505,000 WA State that could be considered as being at low risk for problem gambling (as compared to no risk).<sup>33</sup>

Washington State recognizes two types of Gambling Counselor credentials: 1) the Washington State Gambling Counselor Certification (WSCGC I/II), established and maintained by the Washington State Gambling Counselor Certification Committee since 2006, and 2) the International Gambling Counselor Certification (ICGC I/II), established and maintained by the International Gambling Counselor Certification Board circa 1984.

The annual number of total Certified Gambling Counselors in WA state continues to hover between 30-40 licensed professionals with the addition of new counselors, and the reduction of counselors who retire, move, change fields, or otherwise no longer maintain their practice.

The Washington State Gambling Counselor Certification Committee has made it their 2021-2022 goal to increase the number of Certified Gambling Counselors in our state by 25%.

Barriers to recruiting new professionals in this field include the following:

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<sup>1</sup> Total Active Behavioral Health Clinicians by Credential/License Type: (accessed via beta reporting tool on 10/20/22 at [data.wa.gov](https://data.wa.gov)).

<sup>2</sup> See [WAC 246-341-0754](https://wac.wa.gov/246-341-0754). Tribal Behavioral Health agencies may opt for Tribal Attestation instead: <https://doh.wa.gov/sites/default/files/legacy/Documents/Pubs/346114.pdf>

<sup>33</sup> [2021 WA State Adult Problem Gambling Prevalence Study \(pg. 26\)](#). Percentage at risk for moderate-to-severe problem gambling is 1.5% (confidence interval of 1.1%-1.8%) of WA adults (6,010,120, or 78% of 7,705,821, [WA State 2020 Census](#)).

- **LACK OF AWARENESS OF PROBLEM GAMBLING & OVERLAP WITH CO-OCCURRING DISORDERS.** The general lack of awareness among those who work in the behavioral health field, who otherwise might recognize the clear overlap between gambling and other legal but potentially addicting activities in Washington State (tobacco, alcohol, cannabis), contributes to a lack of awareness that there is a need for them to pursue training and credentialing to effectively treat gambling-related harms.
- **LACK OF RESPONSIBLE GAMING MESSAGING.** Every pack of cigarettes comes with a warning label, every commercial for alcoholic beverages ends with a responsible drinking/legal age/don't drink and drive message, every cannabis distributor billboard states their product is available only to those 21+, and other such responsible and prevention messaging. Yet, little gambling advertising includes a responsible gaming message, including sports betting advertisements often seen by children, highschoolers, college students, and adults. This sends a clear signal that it does not have equal risk, or that there is no reason to take caution or behave differently.
- **LACK OF SUPPORT FROM EMPLOYERS/AGENCIES.** Without the support and consent from employers, it can be difficult for individual counselors to take time away from work to complete the required certification training. Employers need motivation to encourage their staff's professional development in this area.
- **SHORT STAFFING AT AGENCIES.** Many MH/SUD facilities report that they would like to have one or more staff become Certified Gambling Counselors, however, their current staffing shortages prevent the ability to provide caseload and group coverage for staff to take time away from work to complete the required training and supervision.
- **FINANCIAL BARRIERS.** Professional counselors must pay an annual renewal fee for their current WA DOH license. The Gambling Counselor Certifications also require an application fee, exam fee, training expense which may require travel, hotel, meals, etc., clinical supervision, and a bi-annual renewal fee. This cost is offset somewhat by the scholarship funds from the Washington State Problem Gambling program. However, scholarship funds are limited, and professionals will still incur some expenses, which may include the inability to generate income from client sessions while taking time to complete training or supervision for the Gambling Counselor Certification.
- **LACK OF ADEQUATE FUNDING COVERAGE.** Clinical professionals and agencies cannot afford to invest in the Certification to start treating problem gambling/Gambling Disorder without the assurance that their investment of time and money will translate

into an increase in clinical sessions, reimbursable in parity to other similar clinical sessions, that will generate income to at least cover the cost of the services and credentialing maintenance. Many individuals seeking services for mental health and addiction issues are either covered under Medicaid/Medicare, or uninsured/underinsured. Without Medicaid/Medicare coverage of gambling treatment services, few professionals see Gambling Counselor Certification as a self-sustaining clinical service. As of this writing, the WA State Health Care Authority is currently seeking to include problem gambling treatment coverage under Medicaid, based on approval from the Centers for Medicare and Medicaid Services.'

- **LACK OF DIVERSITY AMONG CLINICIANS.** There are few Certified Gambling Counselors who are bilingual or can provide culturally specific treatment services. This may be because of a lack of clinical training in languages other than English, underrepresentation of racial/ethnic minorities in problem gambling research and in treatment populations, and/or inadequate promotion of prevention and recovery messaging in their communities. Support for underrepresented populations to pursue and complete education requirements in the behavioral/mental health fields is also needed. ECPG has recently launched a scholarship fund that seeks to address this issue.

ECPG, the State Program, the Problem Gambling Task Force, and other partners recognize the need for more Certified Gambling Counselors in our state and the importance of addressing the barriers here.

# International and State-level Gambling Counselor Certification and Training Programs

## State-level Programs

Below are links to state certification, certificate, specialty, or endorsement programs, and the hours of basic training required for *initial* certification (basic level) where available, additional requirements apply.

- **Alabama** Council on Compulsive Gambling (ACCG) - Certified Gambling Addiction Counselor (CGAC) <https://www.alccg.org/become-a-certified-counselor>
  - 30 hours of training
- **California** Council on Problem Gambling (CCPG) - California Certified Gambling Counselor (CCGC) <https://calpg.online/certified-gambling-certification/#:~:text=CCGC%2ostands%2ofor%2oCalifornia%2oCertified,requirements%2oprior%2oto%2oearning%2ocertification.>
  - 30 hours of training
- **Connecticut** Certification Board (CCB) - Specialty Certificate in Problem Gambling (SCPG) <https://www.ctcertboard.org/files/pdfs/SCPG%2oApplication.pdf>
  - 30 hours of training
- **Florida** Certification Board - Certified Gambling Addiction Counselor (CGAC) <https://flcertificationboard.org/certifications/certified-gambling-addiction-counselor/>
  - 85 hours of training
- **Illinois** Certification Board, Inc./Illinois Alcohol and Other Drug Abuse Professional Certification Association Inc. (IAODAPCA) - Credential for Problem Gambling (PCGC) [http://www.iaodapca.org/?page\\_id=523](http://www.iaodapca.org/?page_id=523)
  - 30 hours of training
- **Kansas** Department for Aging and Disability Services (KDADS) - Kansas Certified Gambling Counselor (KCGC) <https://www.kdads.ks.gov/provider-home/providers/licensing-and-certification>
  - 60 hours of training
- **Louisiana**: Addictive Disorder Regulatory Authority (ADRA) - Certified Compulsive Gambling Counselor (CCGC) <https://la-adra.org/apply-renew/>
- **Massachusetts** Council on Compulsive Gambling (MCCG) - Massachusetts Gaming Health Specialist Certificate <https://macgh.org/trainings-events/certificate-program-gaminghealthspecialist/>
  - 30 hours gambling training + 15 hours gaming training

- **Mississippi** Council on Problem and Compulsive Gambling - Certified Compulsive Gambling Counselor (CCGC) <http://www.msgambler.org/certification-program/>
  - 30 hours of training
- **Nebraska** Commission on Problem Gambling - Certified Disordered Gambling Counselor (CDGC) <https://problemgambling.nebraska.gov/professional-resources>
  - 72 hours of training
- **Nevada** State Board of Examiners for Alcohol, Drug and Gambling Counselors - Certified Problem Gambling Counselor (CPGC) [https://alcohol.nv.gov/Licensure/GC/General\\_Intormation/](https://alcohol.nv.gov/Licensure/GC/General_Intormation/)
  - 60 hours of training
- **New Mexico** Council on Problem Gambling (NMCPG) - Specialty Certification in Problem Gambling (SCPG) <https://www.nmcp.org/for-counselors-specialty-certification-in-problem-gambling.aspx>
  - 40 hours of training
- **New York** State Office of Addiction Services and Supports (OASAS) - Gambling Specialty Designation (GSD) <https://oasas.ny.gov/credentialing/gambling-specialty-designation-gsd>
  - 60 hours of training
- **Ohio** Chemical Dependency Professionals Board (OCDP) - Gambling Disorder Endorsement <https://ocdp.ohio.gov/Certification-and-Licensure/Endorsement-Requirements>
  - 30 hours of training
- **Oklahoma** Department of Mental Health and Substance Abuse Services (ODMHSAS) and Oklahoma Association on Problem Gambling & Gaming (OAPGG) – Certified Problem Gambling Treatment Counselor <https://www.oapgg.org/for-counselors/certification/>
  - 30 hours of training
- **Oregon:** Mental Health and Addiction Certification Board of Oregon (MHACBO) - Certified Gambling Addiction Counselor (CGAC) <https://www.mhacbo.com/en/certifications/>. OHA Gambling Counselor Core Competencies
  - 60 hours of training
- **Pennsylvania** Certification Board - Certificate of Competency in Problem Gambling [https://www.pacertboard.org/sites/default/files/applications/PCBGamblingApplication\\_o.pdf](https://www.pacertboard.org/sites/default/files/applications/PCBGamblingApplication_o.pdf)
  - 30 hours of training
- **Rhode Island:** Problem Gambling Services of Rhode Island (PGSRI) - Endorsement for treating people with gambling disorders <https://www.pgsri.org/blank-jpu8v>
- **Washington** State Gambling Counselor Certification (WSGCC) - Washington State Certified Gambling Counselor (WSCGC) <https://www.evergreencpg.org/training/counselor-certification-info/>
  - 30 hours of training



## Trainer Certification (CGT)

### IGCCB's list of Preferred Training Providers

[Connecticut Council on Problem Gambling](#)

[Council on Compulsive Gambling of Pennsylvania](#)

[Council on Compulsive Gambling of NJ](#)

[Evergreen Council on Problem Gambling \(Washington\)](#)

[Florida Council on Compulsive Gambling](#)

[Indiana Problem Gambling Awareness Program](#)

[LifeWorks](#)

[Nevada Council on Problem Gambling](#)

[Oklahoma Association on Problem Gambling and Gaming](#)

[Oregon Council on Problem Gambling](#)

[Problem Gambling Network of Ohio](#)

[The Evolution Group \(New Mexico\)](#)

[The Massachusetts Council on Gaming and Health](#)

[The Problem Gambling Help Network of WV](#)

[Wisconsin Council on Problem Gambling](#)



(This list is maintained by IGCCB and can be found online [here](#))



The International Gambling Counselor Certification is recognized in most states. Some states recognize it alone.

- **International Certification** – International Gambling Counselor Certification Board (IGCCB) – Internationally Certified Gambling Counselor (ICGC) <https://www.igccb.org/certifications/>
  - 30hrs of training required

States that do *not* have a state-level certification, certificate, specialty, or endorsement, and may recognize the IGCCB’s ICGC (above) are:

Alaska	Maine	South Dakota
Arizona	Maryland	Tennessee
Arkansas	Michigan	Texas
Colorado	Minnesota	Utah
Delaware	Missouri	Vermont
Georgia	Montana	Virginia
Hawaii	New Hampshire	West Virginia
Idaho	New Jersey	Wisconsin
Indiana	North Carolina	Wyoming
Iowa	North Dakota	
Kentucky	South Carolina	

## **Establishing On-Site Kiosks (e.g., GameSense)**

*Written by Evergreen Council on Problem Gambling per HCA's request for recommendations from subject matter experts.*

Resources, tools, and support for guests at commercial gambling venues, to assist them with making healthy, informed choices about their gambling, are beneficial. Some surveys indicate that players appreciate and seek out gaming venues with these services because they believe the property has their best interests in mind, making these programs a good choice for gaming industry members developing Corporate Social Responsibility Programs to support the communities where they do business. Casinos and other commercial gambling industry members who understand that healthy players who enjoy gambling for recreation and entertainment will return again and again, and that these long-term customers in turn make for a healthy business, might embrace programs such as the one mentioned here – The GameSense Model.

### **The GameSense Model**

For more than a decade, Casinos in British Columbia, Canada, have offered staffed information kiosks and centers in all Provincial Gaming Venues through the British Columbia Lottery Corporation. Others adopting this model since then include MGM Resorts International casino properties, Massachusetts Gaming Commission/Massachusetts Council on Gaming and Health, the Connecticut Lottery, and Canadian provinces Alberta, Saskatchewan, and Manitoba.

Introduced by the British Columbia Lottery Corporation in 2009, GameSense has earned international recognition such as the World Lottery Association's Best Overall Responsible Gambling Program (2010), and the U.S. – based National Council on Problem Gambling's Social Responsibility Award (2015).

Many players may not have extensive knowledge about how certain casino games are played, the odds of winning and losing, what "house advantage" means, etc. Players seeking resources and referrals to support services may not know where to start. Having these services available at the gaming venue makes it easier to assist players in a timely manner when they first begin to seek support.

GameSense combines recommendations on responsible gaming with interactive tools and exhibits meant to engage patrons at casinos, so they have the knowledge they need to make informed decisions about their gambling. Education includes information on how games are played, risks associated with gambling, and tools to support safer gambling practices, such as setting time and budget limits. Support and referral services are available to assist players with problem gambling-related information and available resources, including where to find free or low-cost state-funded treatment and support services. Information is also available through various digital platforms including websites and associated social media channels.



### **GameSense Advisors**

GameSense Advisors (GSAs) are trained to assist players with the property's Voluntary Self-Exclusion information and enrollment. GSAs work closely with gambling venue staff and provide training to help increase staff knowledge of responsible gaming policies and procedures. In Massachusetts, for example, GameSense Info Centers are located on-site at all Massachusetts casinos and operate for 16-hours a day/7 days a week. The Massachusetts Council on Gaming and Health recruits, hires, trains, and supervises GameSense Advisors in their state to provide prevention, information, education, support, and referral services regarding responsible gaming and gambling disorder to players and staff at casinos. All GSAs must be age 21 or older and pass a background check by the Massachusetts Gaming Commission.

### **From the GameSense Website:**

“Some players have shared that, at first, they weren't sure about reaching out to a GameSense Advisor, but once they did, they were happy with the conversation and the support they received. Not only did they learn more about why finding balance with other activities is so important, but just having a friendly conversation with a real person made them feel more informed about their gambling decisions.”

## **Responsible Gaming Training for All Commercial Venues**

*Written by Evergreen Council on Problem Gambling per HCA's request for recommendations from subject matter experts.*

Responsible gaming programs are a critical part of everyday business practices in the U.S. gaming industry. The central goal of these programs is to ensure that patrons responsibly enjoy casino games as a form of entertainment.

### **American Gaming Association**

Providing and promoting responsible gaming through a responsible gaming program that includes annual employee responsible gaming training is good customer services. The intent of an employee responsible gaming training program is... to provide employees with a higher level of understanding and flexibility to appropriately assess a situation, when arising, so that your employees have the ability to determine a course of action.

### **National Council on Problem Gambling**

Most people can enjoy gambling for recreation and entertainment. For some, however, gambling can become a problem. With more and more visitors enjoying gambling as entertainment in casinos and other gaming venues, the need for responsible gaming programs and policies to provide information and education and support gambling addiction prevention and treatment services is crucial. Comprehensive Responsible Gaming Programs that address Training, Awareness and Education Materials, Policies and Procedures, Marketing and Advertising, Health and Safety issues for guests, employees, and communities are important. Training Casino Supervisors and Managers is the first step, followed by training for frontline employees.

Employee Training around responsible alcoholic beverage service has been a requirement for many years. The same should be true for commercial gaming venues to train employees on responsible gambling practices and policies.

A new Statewide Self-Exclusion Program established by the Washington State Gambling Commission is, since May 2022, in effect at all licensed house-banked cardrooms and participating tribal gambling facilities in the state of Washington.

As part of the **Licensee Responsibilities outlined in WAC 230-23-030**, each Licensee must:

(7) Train all new employees, within three days of hiring, and annually retrain all employees who directly interact with gaming patrons in gaming areas. The training must, at a minimum, consist of:

(a) Information concerning the nature of gambling disorders; and

(b) The procedures for requesting self-exclusion; and

(c) Assisting patrons in obtaining information about gambling problem and gambling disorder treatment programs.

This section must not be construed to impose a duty upon employees of the licensee to identify individuals with gambling problems or gambling disorders or impose a liability for failure to do so.

This training is important to address the Self-Exclusion Program for licensees but does not constitute a Comprehensive Responsible Gaming Employee Training, which would serve several purposes:

- Good Customer Service and Corporate Social Responsibility; includes training on established Corporate Responsible Gaming Policies and Procedures.
- Support Resources and Referral to Treatment and Support Services to include:
  - Voluntary Self-Exclusion (whether through the Statewide Self-Exclusion program or individual Tribal Casino Self-Exclusion programs)
  - Helpline and Referral to Treatment Services
- Underage Gambling Policies and Procedures
- Employee Gambling Policies and Support Services: Employee Assistance Programs (EAP), etc.

What limited evaluations of responsible gaming programs exist do show that the programs can be beneficial, but that continuing education and refresher training are needed to ensure success.

The people who work in casinos and other gaming venues are an important and under-researched group in the pathological gambling literature. Gaming employees constitute a unique group not only because they interact daily with customers in casinos, but because they are slightly more vulnerable to gambling disorders than the general population (Shaffer, Vander Bilt, & Hall, 1999). Because of these and other factors, most states and casino operators in the U.S. require gaming employees to go through training on the specifics of disordered gambling and responsible gaming.

International Center for Responsible Gaming; July 8, 2011

The following research also supports the reasons to require Responsible Gaming Training for Employees

From: Gaming Industry Employees' Responses to Responsible Gambling Training: A Public Health Imperative

June 2011 Journal of Gambling Studies 28(2):171-91

Gaming industry employees work in settings that create personal health risks. They also have direct contact with customers who might engage in multiple risky activities (e.g., drinking, smoking, and gambling) and might need to facilitate help-seeking by patrons or co-workers who experience problems. Consequently, the empirical examination of the processes and procedures designed to prepare employees for such complex situations is a public health imperative.

As legalized gambling continues to expand within the United States (U.S.) and across other parts of the world, employment in the gambling services industry is expected to grow at a faster rate than other occupations (e.g., Statistics Canada 1998; United States Department of Labor 2009).

Empirical evaluation of this growing labor force is important because of its size and because gaming employees have direct contact with patrons who engage in potentially risky activities (e.g., drinking beverage alcohol and gambling). Further, gaming employees might need to facilitate help-seeking by patrons who experience gambling related problems during their visit to a gambling venue or suffer from pre-existing gambling-related problems. (D. A. LaPlante (& H. M. Gray R. A. LaBrie H. J. Shaffer Harvard Medical School, Boston, MA, USA e-mail: debi\_laplante@hms.harvard.edu J. H. Kleschinsky Boston University School of Public Health, Boston, MA, USA 123 J Gambl Stud (2012) 28:171–191 DOI 10.1007/s10899-011-9255-z3)

Additionally, gaming industry employees are at-risk for gambling related problems (Shaffer and Hall 2002; Shaffer et al. 1999b). Consequently, these patron/employee interactions have important public health implications.

## Youth Prevention Needs

Youth problem gambling is an emergent public health issue.

“Although gambling is often conceptualized as an adult activity, research has consistently shown that problem gambling is an emergent public health issue among adolescents and emerging adults (Calado et al. 2017), and is part of a broader constellation of other risk behaviours (antisocial, risk-taking, delinquent behaviours) at this developmental stage – particularly for males.” (J Gambl Stud. 2020; 36(2): 573-395

With sports betting now legal in more than 30 states, including Washington, the exposure and access to gambling has increased. In addition, research suggests that individuals who experience gambling-related problems start gambling in adolescent years (Carbonneau et al. 2015). The percentage of high school students with a gambling problem is double that of adults. About 5% of all young people between 11 and 17 meet at least one of the criteria for a gambling problem.

Gambling is regulated by the states, and no federal agency has responsibility for prevention and treatment of problem gambling. Legislators and health departments are starting to recognize the need for awareness and prevention programs that reach young people. Virginia Delegate Sam Rasoul sponsored this year the first state law in the country requiring all public schools to teach students about the risks of gambling.

“Rasoul’s law, which had nearly unanimous support in the legislature, requires the state Board of Education to develop and distribute to all school divisions educational materials on gambling as part of the existing curriculum on substance misuse. Gov. Glenn Youngkin signed the measure in April.” (Stateline Article 7/12/2022 Marsha Mercer)

Research has emphasized that youth tend to respond well to programs that are interactive and engaging. (Oh et al. 2017).

## References and Reading Recommendations

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Appendix M

# **Timeline of Gambling & Problem Gambling Services in WA State**

# APPENDIX M: TIMELINE OF GAMBLING AND PROBLEM GAMBLING SERVICES IN WA STATE<sup>1</sup>

*Note: This timeline presents an overview and does not include all legislative, Tribal, or other activity related gambling and problem gambling in WA State. Any errors or omissions are the responsibility of the authors.*

## **Commercial gambling/gaming**

- 1933** Gambling allowed for pari-mutuel betting on horse racing.
- 1972** State Constitution amended to permit legalized lotteries if 60% majority approval on a proposed lottery. (Sec. 24, Amendment 56)
- 1973** Social gambling activities legislation passed (Chapter 9.46 RCW)
- 1982** State legislation passed to allow for a state lottery (Chapter 67.70 RCW)
- 1984** State lottery opens as 'Lotto'
- 1985 to 2008** Non-casino options became more available, including off-track betting on horse races, pull-tabs, punchboards, etc. Additional Lottery games added (e.g., scratch tickets, Mega Millions)
- 1998 to 2020** Recreational Gaming Association (RGA, an operator organization) and other industry stakeholders advocated over the years for specific changes in commercial gambling, including the expansion of operation hours, increased maximum number of players at gaming tables, increased maximum wagers, addition of mini baccarat, etc.<sup>2</sup>. The RGA was voluntarily dissolved in 2020.
- 2009** Legislation enacted that made gambling by minors (under age 18) a civil infraction, empowered Gambling Commission agents to impose penalties (fines, community restitution) except in specific circumstances, and winnings would be forfeit. (Senate Bill 5040),
- 2011** Legislation enacted that mandated that all ATMs and point-of-sale machines on gambling operator/vendor premises must be disabled from accepting Electronic Benefit Transfer Cards (EBCs).
- 2012 to Now** Commercial gambling operators continue to seek expansion of gambling activities, including legal commercial sports wagering. As of this writing, both online gambling and commercial sports wagering are illegal in WA State.

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<sup>1</sup> This summary has been adapted from the following source with additional updated material added:

**Cronce, J. M., Lostutter, T. W. & Larimer, M. E.** (July 31, 2013). *Washington State problem and pathological gambling treatment program: Levels of care, service gaps, and recommendations*. Report to the Evergreen Council on Problem Gambling and Washington State Department of Social and Health Services, Division of Behavioral Health and Recovery. Adapted and compiled by Roxane Waldron, State Problem Gambling Program Manager (2022).

<sup>2</sup> RGA as an organization is not currently operating in WA State. Maverick Gaming and other commercial operators are active in advocating for commercial gambling.



### **Tribal Nations gambling/Class III Gaming**

- 1976** First casino (on Puyallup Indian Tribe Reservation) opened
- 1978** Federal government closed casino on Puyallup reservation
- 1983** Tulalip, Puyallup and Muckleshoot Tribes began operation of bingo gaming
- 1988** U.S. Congress passes Indian Regulatory Gaming Act (IGRA)
- 1991 to 1998** Some of the 29 federally recognized Tribes opened casinos on Tribal land. Lawsuits arguing against the legitimacy of 'slot' and other electronic gambling machines forced some casinos to shut down while lawsuits were adjudicated.
- 1998** Agreement was reached between Tribal nations and the State of WA on Tribal Lottery System (TLS) machines (operating as an electronic version of the WA State lottery). By 2006, Tribes were reaching the maximum number of electronic gaming machines allowable under Appendix X of the original Tribal gaming compacts.
- 2007 to 2020** X2 Tribal gaming compacts began to include a provision that each Tribe would contribute 0.13% of net win from Class III gaming to organizations that help reduce the impact of problem gambling, with Tribes retaining control of how to allocate these funds.
- 2020** State legislature passed legislation that permits legal sports wagering at Tribal casinos (only on casino premises and geo-fenced). (House Bill 2638, March 2020)
- 2021 to Now** Many Tribes have renegotiated or in the process of renegotiating their Class III Gaming compacts with the State of WA to permit legal sports wagering at their casinos. As of this writing, several tribes have voluntarily increased funding for problem gambling from 0.13% to 0.2% of net win, and this negotiation process is on-going.<sup>3</sup>

### **Problem gambling-related (organizations, state program, & research)**

- 1991** WA State Council on Problem Gambling (now the Evergreen Council on Problem Gambling, or ECPG) established in Olympia WA
- 1992** First comprehensive Adult Problem Gambling Prevalence Study completed (Volberg et.al). Funded by Washington State Lottery.
- 1993** First prevalence study focused on adolescents completed (Volberg et.al.). Funded by Washington State Lottery.
- 1998** Responsible Gaming Task force launched by ECPG to create new materials
- 1999** Replication studies for adults and adolescents (Volberg et.al.) Funded by Washington State Lottery.
- 2000** Awareness and training video released by ECPG Responsible Gaming Task Force to industry and State regulatory agencies; Deaconess Medical Center's Behavioral Health service in Spokane launched new problem gambling treatment program (partially funded by revenue from local gambling).

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<sup>3</sup> Tribes use these funds in several ways: 1) to support their own behavioral health agencies and social services to provide problem gambling services (frequently through prevention activities and/or part of a 'whole person' centered therapeutic environment); 2) to make substantial contributions to organizations that include problem gambling within their scope of work, such as the Evergreen Council on Problem Gambling, the Recovery Café Network, and the State Problem Gambling Program, or 3) a combination of these strategies.

- 2002 to 2004** WA DASA (Division of Alcohol & Substance Abuse/DSHS) partnered with ECPG as lead, and with support of Tribal Nations funding, in launching a new gambling treatment program and ‘proof of concept’ pilot that significantly exceeded both anticipated enrollment and program funding. Program included training for 25 providers for treatment service delivery.
- 2003 to 2005-** *WA State Needs Assessment Household Survey* included *Chapter 6: Prevalence of Gambling in WA State* (released in 2005 by DASA/DSHS)
- 2005** Legislation enacted that mandated allocation of funding generated from commercial and non-profit gambling venues (with annual net revenues greater than \$50,000) and the WA State Lottery. (ESHB 1031) to support a program for statewide education, treatment, and helpline for problem gambling. Clients meeting specific ‘low barrier’ eligibility requirements could receive covered (‘free to the client’) problem gambling treatment from contracted providers. Family members of loved ones affected by problem gambling also covered.
- 2005** State Problem Gambling Program established with state ‘seed’ funding and \$550,000 in contributions from Tribal governments.
- 2012 to 2015** Pierce County Superior Courts (Drug and Family Courts) --Problem Gambling Treatment Diversion pilot program conducted by ECPG with treatment provided by Pierce County Alliance.
- 2019** Washington State Gambling Commission released report: *2019 Problem Gambling Study*, which includes two high-level recommendations: 1) establishment of a statewide voluntary self-exclusion program, and 2) creation of a joint legislative Problem Gambling Task Force<sup>4</sup>
- 2019** State legislature passed two budget provisos: 1) to initiate an adult problem gambling prevalence study (including appropriation of \$500,000 from state problem gambling account), and 2) establish a joint legislative Problem Gambling Task Force (including appropriation of \$100,000 for task force facilitation).
- 2021** State Problem Gambling Program funded a ‘pilot’ case for residential problem gambling treatment (at Free by the Sea).
- 2020 to 2022** State Problem Program (DBHR/HCA) conducted 2021 WA State Adult Problem Gambling Prevalence Study. Funded by legislative appropriation from the state problem gambling account to State Problem Gambling Program, which also provided supplemental funding. Additional funding support also came from the Evergreen Council on Problem Gambling, Final report was submitted to Legislature in October 2020.
- 2020 to 2023** Joint legislative Problem Gambling Task Force met from Jan 2023-Nov 2023 as a full task force and i<sup>5</sup>n workgroups to 1) review existing problem gambling services with a focus on state-funded services, 2) ensure initiation of the prevalence study, 3) assess gaps, and 4) submit a final report to the Legislature with recommendations on closing gaps within the state-funded services and more broadly in WA State. The final report is due no later than Dec 31, 2022.

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<sup>4</sup> [2019 Problem Gambling Study. Washington State Gambling Commission](#) (by Lostutter, T and Philander, K).

<sup>5</sup> First meeting held in January 2020; due to pandemic, the rest of meetings were held entirely online by Zoom.

**PGTF**

**Problem Gambling Task Force**



STATE OF WASHINGTON  
GAMBLING COMMISSION

*"Protect the Public by Ensuring that Gambling is Legal and Honest"*

November 30, 2022

**TO:**           **COMMISSIONERS**  
                  Alicia Levy, Chair  
                  Julia Patterson, Vice Chair  
                  Bud Sizemore  
                  Kristine Reeves  
                  Sarah Lawson

**EX OFFICIO MEMBERS**  
                  Senator Steve Conway  
                  Senator Jeff Holy  
                  Representative Brandon Vick  
                  Representative Shelly Kloba

**FROM:**       Jennifer <sup>JL</sup>LaMont, Agent in Charge  
                  Licensing Unit

**SUBJECT:**   House-Banked Card Room Summary of Activity Fiscal Year Ended 2021

**Fiscal Year 2021 Information**

During the year ended December 31, 2021, there were 43 licensed house-banked card rooms. As of the date of this memo, one house-banked card room went out of business. One house-banked card room was licensed but did not operate and as a result, their numbers were not included in this report. Thirty-eight (38) licensees reported a net income between \$120,000 and \$7,573,336; four licensees reported net losses between (\$726,000) and (\$1,697,720).

Financial statements are prepared on the assumption that the business is a *going concern*, meaning that it will continue in operation for the foreseeable future. An auditor or reviewer who concludes that substantial doubt exists with regard to the going concern assumption is required to issue an opinion reflecting this concern. Of the 42 licensees that reported for year ended in 2021, one card room had a going concern issue reflected in their financial statement report. Of the 43 licensees that reported for year ended in 2020, one had a going concern issue reflected in their financial statement report.

The following is a comparison between 2021 and 2020.

	2021		2020	
	#	%	#	%
Licensees with positive Net Income	38	90.5%	16	37%
Licensees with Net Losses	4	9.5%	27	63%
Total	42	100%	43	100%

Range of Net Income	\$120,000 to \$7,573,336	\$33,000 to \$2,510,208
Range of Net Loss	(\$726,000) to (\$1,697,720)	(\$62,576) to (\$2,022,759)
# of Case Reports Written	0	0

Special Agents from the Licensing Unit have reviewed all the financial statements that were submitted.

For fiscal year ended 2021, 42 house-banked card rooms submitted their financial statements. As of the date of this memo, the following changes have occurred with the house-banked card room licensees:

- Lucky Dragonz Casino received a new license.
- New Phoenix Casino received a new license.
- Fortune Casino Lacey (formerly known as Hawks Prairie Casino) received a new license.
- Iron Horse Casino changed its name to Imperial Palace Casino.
- Last Frontier Casino downgraded to an F-endorsed Card Room.

**Background**

According to WAC 230-15-740, all house-banked card game licensees must submit financial statements within 120 days following the end of their business year.<sup>1</sup> Licensees are allowed a one-time, 60-day extension if needed, and the majority of the financial statements are received on or about June 30 of each year.

The type of financial statement licensees must submit is dependent upon the gross receipts from the card room:

<u>Gross Receipts for Fiscal Year End 2021</u>	<u>Type of Financial Statements Required</u>
Over \$6 million	Audit
Less than \$6 million but more than \$1 million	Review
Less than \$1 million	Compilation

Licensees are required to have the financial statements prepared by an independent, certified public accountant licensed by the Washington State Board of Accountancy and they must be prepared in accordance with generally accepted accounting principles, including all required footnotes or disclosures. The licensee is also required to report gross revenues for each licensed activity separately and present comparative statements.

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<sup>1</sup>Some licensees do not have a fiscal year-end date of December 31.

In 2002, we began summarizing and posting on our website the financial statement information we collected from the house-banked card rooms. The financial statement summary provides users with the gross card room revenue as well as the overall net income or loss of the business.

The type of legal entity a licensee is (i.e. sole proprietor, corporation, or LLC) will impact how some costs are recorded to determine the overall business's net income or loss. This means that you cannot necessarily compare the licensees in terms of their net income or loss reported based on similar gross receipt levels. For example, some licensees record an owner's salary as expenses while some owners take owner draws, which does not impact the net income or loss.

Attachment (1)

Summary of House-Banked Card Room Financial Statements  
For the Fiscal Year Ending in 2021  
Sorted by Licensee Net Income or (Loss)

Licensee	City	----- 2021 REVENUES -----		Total Revenue	Total Expenses	Net Income or (Loss)
		Card Room Revenue	Other Revenue			
		(1)	(2)		(3)	[4]
FORTUNE CASINO - RENTON	Renton	\$ 17,097,989.00	\$ 2,816,904.00	\$ 19,914,893.00	\$ 12,341,557.00	\$ 7,573,336.00
CRAZY MOOSE CASINO/PASCO	Pasco	\$ 10,586,000.00	\$ 2,183,000.00	\$ 12,769,000.00	\$ 7,204,000.00	\$ 5,565,000.00
NOB HILL CASINO	Yakima	\$ 4,238,796.00	\$ 1,168,968.00	\$ 5,407,764.00	\$ 1,089,594.00	\$ 4,318,170.00
THE PALACE/LACENTER	LaCenter	\$ 6,788,877.00	\$ 1,175,876.00	\$ 7,964,753.00	\$ 3,716,758.00	\$ 4,247,995.00
MACAU CASINO/LAKEWOOD	Lakewood	\$ 9,140,000.00	\$ 1,541,000.00	\$ 10,681,000.00	\$ 6,541,000.00	\$ 4,140,000.00
BLACK PEARL RESTAURANT & CARD ROOM	Spokane	\$ 6,506,770.00	\$ 728,471.00	\$ 7,235,241.00	\$ 3,282,776.00	\$ 3,952,465.00
ROMAN CASINO	Seattle	\$ 13,718,000.00	\$ 3,518,000.00	\$ 17,236,000.00	\$ 13,284,000.00	\$ 3,952,000.00
GREAT AMERICAN CASINO/EVERETT	Everett	\$ 8,810,000.00	\$ 1,516,000.00	\$ 10,326,000.00	\$ 6,600,000.00	\$ 3,726,000.00
FORTUNE CASINO - TUKWILA	Tukwila	\$ 10,956,932.00	\$ 2,243,174.00	\$ 13,200,106.00	\$ 9,779,913.00	\$ 3,420,193.00
CHIPS CASINO/LAKEWOOD	Lakewood	\$ 11,620,182.00	\$ 2,033,170.00	\$ 13,653,352.00	\$ 10,355,556.55	\$ 3,297,795.45
JOKER'S CASINO SPORTS BAR & FIESTA	Richland	\$ 4,004,381.00	\$ 2,305,076.00	\$ 6,309,457.00	\$ 3,032,138.00	\$ 3,277,319.00
CASINO CARIBBEAN/YAKIMA	Yakima	\$ 6,338,000.00	\$ 1,221,000.00	\$ 7,559,000.00	\$ 4,653,000.00	\$ 2,906,000.00
COYOTE BOB'S	Kennewick	\$ 5,919,000.00	\$ 807,000.00	\$ 6,726,000.00	\$ 3,871,000.00	\$ 2,855,000.00
CASINO CARIBBEAN/KIRKLAND	Kirkland	\$ 7,978,000.00	\$ 1,128,000.00	\$ 9,106,000.00	\$ 6,338,000.00	\$ 2,768,000.00
BUZZ INN STEAKHOUSE/EAST WENATCHEE	East Wenatchee	\$ 3,281,025.00	\$ 3,050,180.00	\$ 6,331,205.00	\$ 3,981,913.00	\$ 2,349,292.00
GOLDIE'S SHORELINE CASINO	Shoreline	\$ 10,718,017.00	\$ 2,808,440.00	\$ 13,526,457.00	\$ 11,199,315.09	\$ 2,327,141.91
HAWKS PRAIRIE CASINO	Lacey	\$ 3,893,250.00	\$ 890,944.00	\$ 4,784,194.00	\$ 2,604,793.00	\$ 2,179,401.00
ROXY'S BAR & GRILL	Seattle	\$ 4,390,107.00	\$ 2,380,446.00	\$ 6,770,553.00	\$ 4,727,513.00	\$ 2,043,040.00
LILAC LANES & CASINO	Spokane	\$ 2,137,234.00	\$ 1,732,264.00	\$ 3,869,498.00	\$ 2,051,912.00	\$ 1,817,586.00
RIVERSIDE CASINO	Tukwila	\$ 12,362,331.00	\$ 3,492,566.00	\$ 15,854,897.00	\$ 14,051,410.98	\$ 1,803,486.02
SLO PITCH PUB & EATERY	Bellingham	\$ 1,762,260.00	\$ 2,163,869.00	\$ 3,926,129.00	\$ 2,317,370.00	\$ 1,608,759.00
CRAZY MOOSE CASINO/MOUNTLAKE TERRACE	Mountlake Terrace	\$ 4,715,000.00	\$ 678,000.00	\$ 5,393,000.00	\$ 3,890,000.00	\$ 1,503,000.00
MACAU CASINO/TUKWILA	Tukwila	\$ 6,545,000.00	\$ 1,473,000.00	\$ 8,018,000.00	\$ 6,515,000.00	\$ 1,503,000.00
GREAT AMERICAN CASINO/TUKWILA	Tukwila	\$ 6,310,000.00	\$ 1,921,000.00	\$ 8,231,000.00	\$ 6,787,000.00	\$ 1,444,000.00
CLEARWATER SALOON & CASINO	Wenatchee	\$ 3,398,282.00	\$ 883,537.00	\$ 4,281,819.00	\$ 2,990,892.00	\$ 1,290,927.00
LAST FRONTIER	LaCenter	\$ 9,255,914.00	\$ 1,210,137.00	\$ 10,466,051.00	\$ 9,179,261.00	\$ 1,286,790.00
SILVER DOLLAR CASINO/RENTON	Renton	\$ 6,731,000.00	\$ 1,543,000.00	\$ 8,274,000.00	\$ 7,045,000.00	\$ 1,229,000.00
ALL STAR CASINO	Silverdale	\$ 3,394,437.00	\$ 3,658,890.00	\$ 7,053,327.00	\$ 5,874,299.00	\$ 1,179,028.00
WILD GOOSE CASINO	Ellensburg	\$ 831,461.00	\$ 342,111.00	\$ 1,173,572.00	\$ 198,289.00	\$ 975,283.00
PALACE CASINO/LAKEWOOD	Lakewood	\$ 6,981,029.00	\$ 2,106,317.00	\$ 9,087,346.00	\$ 8,301,127.37	\$ 786,218.63
PAPAS CASINO RESTAURANT & LOUNGE	Moses Lake	\$ 1,353,040.00	\$ 3,420,094.00	\$ 4,773,134.00	\$ 4,153,105.00	\$ 620,029.00
LANCER LANES RESTAURANT AND CASINO	Clarkston	\$ 841,138.00	\$ 640,303.00	\$ 1,481,441.00	\$ 941,480.00	\$ 539,961.00
GREAT AMERICAN CASINO/LAKEWOOD	Lakewood	\$ 4,301,000.00	\$ 811,000.00	\$ 5,112,000.00	\$ 4,589,000.00	\$ 523,000.00
RC'S AT VALLEY LANES	Sunnyside	\$ 438,279.00	\$ 643,839.00	\$ 1,082,118.00	\$ 629,269.00	\$ 452,849.00
SILVER DOLLAR CASINO/MILL CREEK	Mill Creek	\$ 3,522,000.00	\$ 471,000.00	\$ 3,993,000.00	\$ 3,632,000.00	\$ 361,000.00
CARIBBEAN CARDROOM	Kirkland	\$ 2,280,000.00	\$ 328,000.00	\$ 2,608,000.00	\$ 2,285,000.00	\$ 323,000.00
ZS RESTAURANT AT ZEPPOZ	Pullman	\$ 533,584.00	\$ 1,742,537.00	\$ 2,276,121.00	\$ 1,996,425.00	\$ 279,696.00
SILVER DOLLAR CASINO/SEATAC	SeaTac	\$ 3,826,000.00	\$ 1,222,000.00	\$ 5,048,000.00	\$ 4,928,000.00	\$ 120,000.00
ROYAL CASINO	Everett	\$ 2,382,000.00	\$ 372,000.00	\$ 2,754,000.00	\$ 3,480,000.00	\$ (726,000.00)
WIZARDS CASINO	Burien	\$ 1,176,000.00	\$ 293,000.00	\$ 1,469,000.00	\$ 2,311,000.00	\$ (842,000.00)
CLUB HOLLYWOOD CASINO	Shoreline	\$ -	\$ 13,000.00	\$ 13,000.00	\$ 1,648,000.00	\$ (1,635,000.00)
IRON HORSE CASINO/AUBURN	Auburn	\$ 4,711,027.00	\$ 1,546,247.00	\$ 6,257,274.00	\$ 7,954,994.00	\$ (1,697,720.00)

**NOTE:** House-banked card room licensees must submit financial statements to the commission within 120 days after the end of their fiscal year. The financial statements include all gambling and non-gambling revenues and expenses of the licensee.

(1) Card Room Revenue is the gross revenue from the card room activity only. No other gambling activity revenues are included.

(2) Other Revenue is all revenues earned by the licensee other than from the card room, as defined above. This may include revenues from pull tabs, amusement games, food, beverage, and any other services/activities provided by the licensee.

(3) Total Expenses are all the expenses incurred by the licensee to operate their business during the fiscal year. Expenses may include such items as cost of sales, advertising, wages, utilities, depreciation, interest expenses, taxes, and Federal Income Tax Provisions.

(4) Net loss may include impairment of goodwill and loss on disposal of discontinued operations; net income may include debt forgiveness and gain on deconsolidation.

(5) Average Net Income (Net Loss) of those reporting:

	Average	#	%
Net Income	\$ 2,224,862	38	90.48%
Net Loss	\$ 1,225,180	4	9.52%
Combined	\$ 1,896,287	42	100.00%

(6) This report is merely a summary of the financial information reported to us. The actual financial statements, footnotes, and auditor's report are an integral part of this information.

(7) Maverick Gaming, LLC submitted financial statements rounded to the nearest thousand dollars.

Tab 2

Petition for Reconsideration





# Washington State Gambling Commission

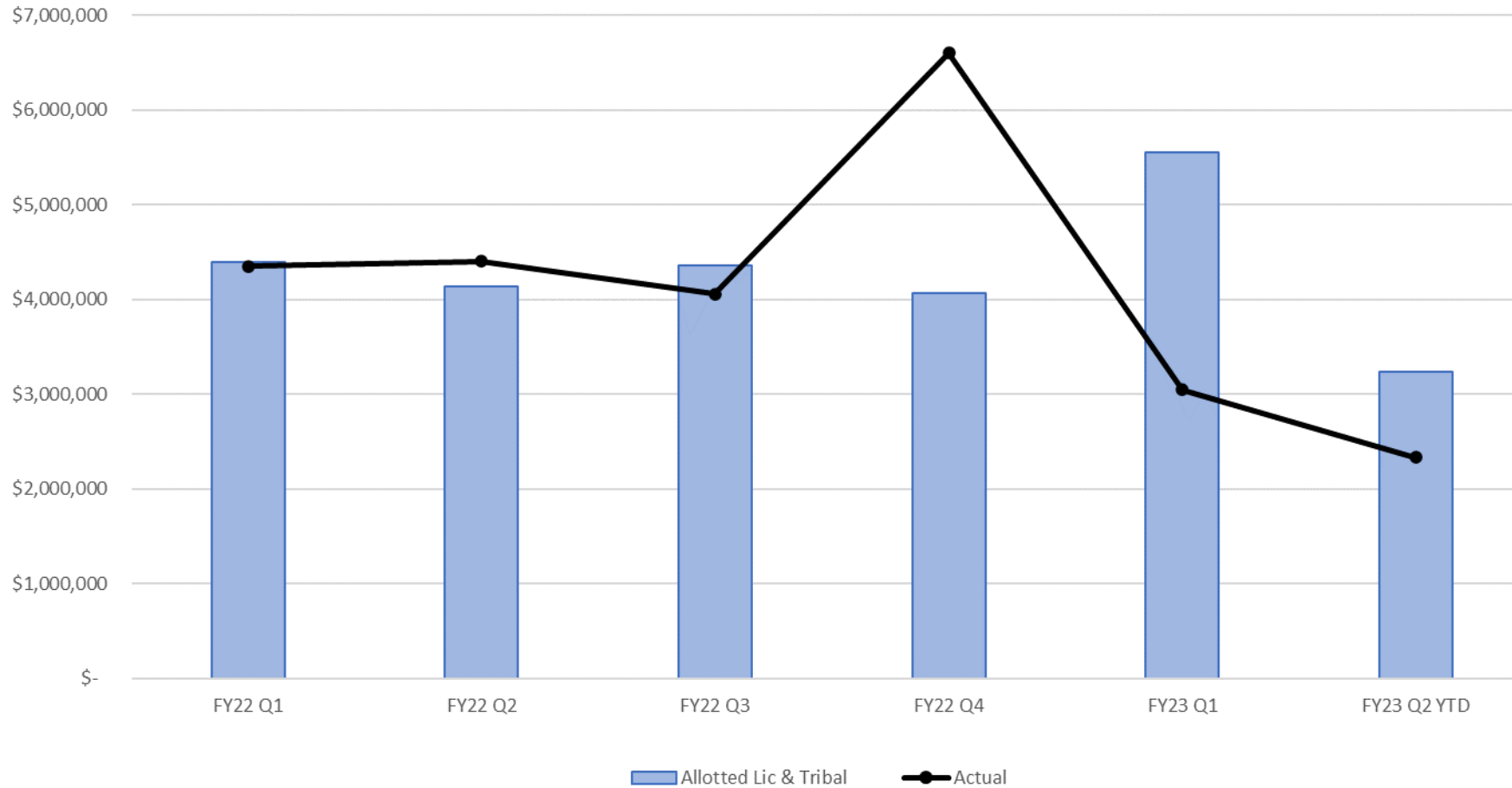
January 2023 financial update

Kriscinda Hansen, Chief Financial Officer

*Protect the public by ensuring that gambling is legal and honest*

# Revenue from License fees and Tribal Reimbursements

Allotted vs actual 21-23 biennium to date



State Fiscal Year is July 1 – June 30.

FY22 Q4 and FY23 Q1 revenue differences are partially due to change in revenue receiving process for Tribal Reimbursement payments.

FY23 Q2 closes mid-January. YTD is first two months of quarter.



# Biennium to date revenue and expenditures



State Fiscal Year is July 1 – June 30.

FY22 Q4 and FY23 Q1 revenue differences are partially due to change in revenue receipting process for Tribal Reimbursement payments.

FY23 Q2 closes mid-January. YTD is first two months of quarter.

# Biennium to date revenue summary by category

Total Revenue by Category	Allotted	Actual	Variance
Activity Licenses - Commercial	8,730,252	8,802,399	72,146
Activity Licenses - Non-Profit	1,945,568	1,506,572	(438,996)
Individual Licenses	4,251,925	5,391,550	1,139,625
Vendor Licenses and fees	2,400,287	1,434,386	(965,901)
Sports Wagering	1,942,500	2,448,179	505,679
Tribal Reimbursement	6,273,776	5,879,918	(393,858)
Expected revenue subtotal	25,544,308	25,463,003	(81,304)
Other Sources (unexpected)	293,627	748,839	455,212
<b>Total</b>	<b>25,837,935</b>	<b>26,211,843</b>	<b>373,908</b>



Current biennium is July 1 2021 through June 30 2023.



# Looking ahead to 23-25 biennium

- ▶ Governor's proposed budget – overall expenditure increase of 8%
  - ▶ 4% general wage increase July 1, 2023
  - ▶ 3% general wage increase July 1, 2024
  - ▶ Retention pay
  - ▶ Vaccine booster incentive pay
  - ▶ Employer benefit contribution increases
  - ▶ Central service model increases (AG costs, WaTech/DES costs)
- ▶ Costs of goods/services continue to increase



# Fund Balance Review

Fund balance as of November 2022 close	
November beginning balance	\$ 19,301,710
November revenue	\$ 1,130,348
November expenditures	\$ (1,272,662)
Reserved funds	
Working capital reserve - OFM requirement	\$ (5,550,063)
IT Modernization* - based on 2020 estimate	\$ (9,100,000)
Website redesign	\$ (300,000)
Remaining balance due to general fund on SW loan (principal and interest)	\$ (3,106,717)
Fund reimbursements	
Estimated tribal reimbursement for SW expenditures and interest	\$ 1,627,161
Transfer from forfeiture funds to reimburse revolving fund	\$ 375,195
<b>Available fund balance as of November 30, 2022</b>	<b>\$ 3,104,971</b>

\* IT Modernization does not include records management system







# Washington State Gambling Commission

Questions?

*Protect the public by ensuring that gambling is legal and honest*



**Staff Proposed Rule-Making**

WAC 230-05-160 - Charitable or nonprofit organization fees.

WAC 230-05-165 - Commercial stimulant organization fees.

WAC 230-05-170 - Fees for other businesses.

WAC 230-05-175 - Individual licensee fees.

**January 2023 – Initiate Rule-Making**

Tab 4: January 2023 Commission Meeting Agenda.	Statutory Authority 9.46.070
<b>Who Proposed the Rule Change?</b>	
Washington State Gambling Commission Staff	
<b>Background</b>	
<p>RCW 9.46.070(5) requires the Commission to set fees to generate funds necessary to cover all costs of regulation, licensing, and enforcement.</p> <p>In the last 20 years, the Commission has increased fees approximately every five years (1998, 1999, 2002, 2003, 2007, and 2014). The last fee increase was an across the board increase of 6 percent effective November 2014.</p> <p>At its inception, a license fee structure was created primarily based on a “class” system with 25 fees. By 2017, the fee structure had grown to approximately 194 different fees for commercial organizations, nonprofit organizations, and individuals. In September 2017, staff introduced to the Commissioners several new and amended rules designed to simplify the fee structure and eliminate the “class” system and advance payment of annual fees. Commissioners voted to file the draft rules for further discussion.</p> <p>In January 2018, Commissioners approved the new and amended rules, creating a new license fee structure. The simplified license fee structure established base fees by license type, set fee rates as a percentage of gross gambling receipts, and established maximum annual fees. This new license fee structure became effective in May 2018.</p> <p>Although the gambling industry has largely recovered from a significant contraction due to the COVID-19 pandemic, the number of licensees has decreased. While there were 2,920 organizational licensees as of September 30, 2019, the number has declined to 2,545 as of September 30, 2022. This decline in licensees has caused revenues to flatten. At the same time, operating costs continue to increase in this inflationary period to include increases in salaries and benefits, supplies and equipment, and government services from agencies such as the Attorney General’s Office and Department of Enterprise Services.</p>	
<b>Policy Considerations</b>	
<p>The current license fees are not projected to be sufficient to cover the agency’s costs of licensing, regulation, and enforcement beginning in fiscal year 2024.</p>	
<b>Staff Recommendation</b>	
<p>Staff recommends initiating rulemaking to address license fee increases to cover the costs of licensing, regulation, and enforcement.</p>	





**Staff Proposed Rule-Making**

WAC 230-05-170 – Fees for other businesses.

WAC 230-05-175 – Individual licensee fees.

**January 2023 – Initiate Rule-Making**

Tab 5: January 2023 Commission Meeting Agenda.	Statutory Authority 9.46.070
<b>Who Proposed the Rule Change?</b>	
Washington State Gambling Commission Staff	
<b>Background</b>	
<p>On March 25, 2020, Governor Jay Inslee signed House Bill 2638, authorizing sports wagering for Class III Tribal facilities under terms negotiated in Tribal-State Compacts.</p> <p>Effective August 30, 2021, the Commission amended WAC 230-05-170 (1) to add license fees for three different types of sports wagering vendors:</p> <ul style="list-style-type: none"> <li>• Major Sports Wagering Vendor - \$65,000</li> <li>• Mid-Level Sports Wagering Vendor - \$10,000</li> <li>• Ancillary Sports Wagering Vendor - \$5,000</li> </ul> <p>A major sports wagering vendor provides integral sports wagering goods or services. A mid-level sports wagering vendor provides services or equipment related to data, security, and integrity. An ancillary sports wagering vendor provides necessary sports wagering support services.</p> <p>At the time of adoption, Tribal partners and stakeholders expressed concern regarding the high license fees. Due to the concerns expressed, the Commission agreed to reevaluate the license fees for sports wagering vendors before the second year of renewal at the end of June 2023 since there was not enough data on the actual costs incurred before the first renewal period.</p>	
<b>Policy Considerations</b>	
<p>As sports wagering is an authorized Tribal-only gambling activity, the costs to the Gambling Commission for licensing and enforcement must be supported by licensing fees collected from sports wagering vendors. The expenses related to licensing and enforcement should not be passed on to the licensees not benefiting from the activity. The amount of the vendor fees established in 2021 was based on the Commission’s best estimate of the costs associated with both licensing and enforcement of a new gambling activity and its best guess of the number of vendors who would be applying for each license type. Now that the Commission has experienced a year of licensing and enforcement of these vendors, it has the necessary information to determine vendor fees.</p>	
<b>Staff Recommendation</b>	
<p>Staff recommends initiating rulemaking to facilitate further discussion of the sports wagering vendor license fees.</p>	



## Rule Petition to Amend

WAC 230-15-140- Wagering limits for house-banked card games

**JANUARY 2023 – Discussion and Possible Filing**

**AUGUST 2022 – Initiate Rule-Making**

**JULY 2022 – Rule-Making Petition Received**

**Tab 6: JANUARY 2023 Commission Meeting Agenda.**

**Statutory Authority 9.46.070**

### Who Proposed the Rule Change?

Vicki Christophersen, Representing Maverick Gaming in Kirkland, Washington

### Background

**BOLD = Changes made after August 2022 Commission Meeting.**

Vicki Christophersen, representing Maverick Gaming, is proposing to amend WAC 230-15-140 as follows:

- Increase the maximum single wagering limit from \$300 to \$500 for all house-banked gaming tables. Provided that if the licensee has a “high limit room” they may increase the single wagering limit to \$1,000 for a select number of high limit tables as follows:
  - Cardrooms with 1-5 total tables – no more than 1 high limit table; or
  - Cardrooms with 6-10 total tables – no more than 2 high limit tables; or
  - Cardrooms with 11-15 total tables – no more than 3 high limit tables.
- Add a definition of “high limit room” meaning a clearly identified area of the gaming facility separated by a permanent physical barrier or a separate room in the gaming facility.
- Restrict access to high limit tables in the high limit room to only prescreened players and players who are not self-excluded from gambling or exhibit problem gambling behaviors.

The petitioner feels this change is needed for several reasons:

- To reflect current economic conditions and customer demand; and
- Wagering limits have not been increased since 2009 and operating costs have increased significantly since then; and
- Minimum wage has nearly doubled since 2009 and supply chain issues and inflation has had a negative impact on card room revenue; and
- To keep the wagering limits for card rooms fair and consistent with competitors, specifically Tribal casinos. Tribal compacts have been steadily amended to increase wagering limits at their casinos.

The petitioner feels the effect of this rule change will allow house-banked card rooms to compete on a more level playing field with Tribal casinos. The petitioner also believes the rule change will allow for the preservation of family wage jobs and economic contributions to the communities they are part of. Lastly, the petitioner feels that the rule change will provide increased tax collection for the local jurisdictions they operate house-banked card rooms in.

**At the August 2022 meeting, Commissioners accepted a petition and chose to initiate rule-making to amend WAC 230-15-140 related to wagering limits for house-banked card games. At the meeting, the Commissioners expressed several questions they had and information they felt they needed before proceeding forward.**

Before you today are four draft language options to consider, in no particular order:

- **Option A**: Allows for wagering limits over the current maximum limit of \$300 but not to exceed \$500 under certain conditions. Conditions include: 1) limits over \$300 must be approved in internal controls; 2) only three tables are authorized to have limits greater than \$300; 3) the licensee must establish a designated space (i.e. a high limit room/area) for tables where limits over \$300 will be played; 4) problem gambling signage must be posted in the high limit room/area; and 5) verification that players are not on the self-exclusion list prior to them gambling at limits greater than \$300.
- **Option B**: Increases the maximum wagering limit from \$300 to \$500 for a single wager.
- **Option C**: Increases the maximum wagering limit from \$300 to \$400 for a single wager.
- **Option D**: Increases the maximum wagering limit from \$300 to \$500 for a single wager. In addition, it allows for wagering limits up to \$1,000 under certain conditions. Conditions include: 1) limits over \$500 must be approved in internal controls; 2) only three tables are authorized to have limits greater than \$500; 3) the licensee must establish a designated space (i.e. a high limit room/area) for tables where limits over \$500 will be played; 4) problem gambling signage must be posted in the high limit room/area; and 5) verification that players are not on the self-exclusion list prior to them gambling at limits greater than \$500.

Attachments:

- Petition
- WAC 230-15-140
- Draft Language Options
- History of Wagering Limits

#### Stakeholder Feedback

On August 10, 2022, Tony Johns, General Manager of Chips/Palace Casino in Lakewood, WA, sent a letter to the Commission on behalf of Evergreen Gaming in support of the petition to raise wagering limits. The letter in question is attached in the Commission Meeting packet.

On September 28, 2022, staff held a stakeholder meeting to discuss the wagering limit petition. There were 14 participants from the gaming industry. The consensus was support for the petition to raise wagering limits for house-banked card games. No participant in the meeting was against raising wagering limits.

On September 28, 2022, staff held a meeting with tribal partners to discuss three outstanding petitions to include the wagering limit petition.

On October 26, 2022, the petitioner submitted two documents to the WSGC:

- Document titled “Follow up to questions posted by WSGC member to Maverick Gaming petition to increase wager limits.” Note: The petitioner submitted this document in response to the Commissioner’s questions at the August 2022 meeting.
- Document titled “A Brief History of Gambling in Washington State.”

Both documents referenced above are attached. WSGC staff has not independently verified the alleged facts contained in either document.

On December 1, 2022, the petitioner submitted an untitled document to the WSGC describing various wagering limits for different states. The document is attached. WSGC staff has not independently verified the alleged facts contained in the document.

Further stakeholder and Tribal partner outreach will occur following the filing of the rules for further discussion.

**Attachments:**

- Stakeholder Letter
- Documents submitted by Maverick Gaming (3)

**Policy Considerations**

Pursuant to RCW 9.46.0282, the number of tables in a card room shall not exceed a total of fifteen separate tables. The petitioner is not requesting to operate more than fifteen tables. Rather, the petitioner is requesting that the wagering limits be increased from \$300 to \$500 on all tables with the ability to raise limits to \$1,000 for a select number of high limit tables.

House-banked card rooms opened in 1997 where wagering limits for games were set at \$25. In 2000, wagering limits increased to \$100, in 2004 to \$200, and lastly in 2009 to the current limit of \$300.

In 2016, the Commission received a petition from the Recreational Gaming Association (RGA) requesting the Commission to increase wager limits to \$500 that would match the limits of Tribal gaming operations at that time. The Commission accepted the petition for further discussion, but the RGA eventually withdrew their request after hearing Commissioner concerns about increasing the wager limit and problem gambling.

In January 2022, the Commission received a petition from Tim Merrill with Maverick Gaming requesting the Commission to increase wagering limits to \$500 with the ability to raise the limit to \$1,000 on 25% of tables. The petition was withdrawn by Tim Merrill prior to the Commissioners taking any action.

Additional rulemaking will be needed to address policy concerns, new definitions, and possible new requirements.

**Problem Gambling Implications**

Staff reached out to the Evergreen Council on Problem Gambling for feedback and/or for further resources to determine the impacts of problem gambling should table game wager limits be increased. As of December 29, 2022, no feedback had been received indicating increasing wager limits would impact those who had a problem with gambling.

Staff reviewed the Massachusetts Gambling Impact Cohort Study of April 16, 2021, entitled “A Six-Year Longitudinal Study of Gambling and Problem Gambling in Massachusetts” and the “New Zealand National Gambling Study Wave 4 (2015) Report Number 6” from March 29, 2018, for

**information on the impact of higher table game wager limits on players who have a problem with gambling.**

**Neither report indicated that higher table game wager limits were predictors of problem gambling.**

**The studies can be found at:**

- [https://massgaming.com/wp-content/uploads/MAGIC-Six-Year-Longitudinal-Study-of-Gambling-and-Problem-Gambling-in-Massachusetts\\_Report-4.16.21.pdf](https://massgaming.com/wp-content/uploads/MAGIC-Six-Year-Longitudinal-Study-of-Gambling-and-Problem-Gambling-in-Massachusetts_Report-4.16.21.pdf)
- [https://phmhri.aut.ac.nz/ data/assets/pdf file/0019/193123/Final-Report-National-Gambling-Study-Report-6-29-March-2018.pdf](https://phmhri.aut.ac.nz/data/assets/pdf_file/0019/193123/Final-Report-National-Gambling-Study-Report-6-29-March-2018.pdf)

### **Staff Recommendation**

**Your options are to:**

- 1) File one of the draft language options for further discussion; or**
- 2) Request staff to continue to work on draft language; or**
- 3) File amended language (make changes during the public meeting); or**
- 4) Withdraw the notice of rule-making and state any reasons for the withdrawal.**

## Lohse, Jess (GMB)

---

**From:** no-reply@wsgc.wa.gov on behalf of WSGC Web <no.reply@wsgc.wa.gov>  
**Sent:** Tuesday, July 12, 2022 11:47 AM  
**To:** Rules Coordinator (GMB)  
**Subject:** Request a Rule Change Submission from wsgc.wa.gov

External Email

Submitted on Tuesday, July 12, 2022 - 11:47am Submitted by anonymous user: 24.56.241.117 Submitted values are:

Petitioner's Name: Vicki Christophersen

Mailing Address: P.O. Box 3329

City: Kirkland

State: WA

Zip Code: 98083

Phone: 3604852026

Email: vicki@christopherseninc.com

Rule Petition Type: Amend Rule – I am requesting WSGC to change an existing rule.

==Amend Rule – I am requesting WSGC to change an existing rule.==

List rule number (WAC) if known: WAC 230-15-140

I am requesting the following change:

Request changes to WAC 230-15-140 to update and reflect current economic conditions. Suggested changes for consideration include:

1. Amend requirements to allow a maximum bet at cardrooms of five hundred dollars (\$500)
2. Amend requirements to allow a designated high limit room consisting of a limited number of tables.
  - a. Tables could be limited in the following manner:
    - i. Cardrooms with 1-5 total tables – no more than 1 high limit table
    - ii. Cardrooms with 6-10 total tables – no more than 2 high limit tables
    - iii. Cardrooms with 11-15 total tables – no more than 3 high limit tables
3. Recommend that the single wager at a high limit table must not exceed one thousand dollars (\$1000).
4. Suggested definitions:
  - a. "High Limit Room" means a clearly identified area of the Gaming Facility separated by a permanent, physical barrier or a separate room in the Gaming Facility.
  - b. "Permanent, physical barrier" includes a partial wall, fence or similar separation. Stanchions or similar movable barriers are not considered a permanent, physical barrier.
5. Suggested requirements:
  - a. Access to the tables in a High Limit Room will be

subject to prescreening qualifications and screening process.

b. Require that no customers may participate in gaming in a High Limit Room if they are known to the Gaming Operation to have

a history of problem gambling or currently barred for self-exclusion, or known by the Gaming Operation as demonstrating

significant characteristics associated with problem gambling.

This change is needed because:

Wager limits need to be updated to reflect current economic conditions and customer demand. Wager limits for House banked card rooms have been set at three hundred dollars (\$300) since 2009. In the 13 years since the limit was established, operating costs have increased dramatically. Since 2009, Washington minimum wage has nearly doubled. Additionally, supply change issues and inflation have an impact on revenue. Once a significant driver of revenue and employment at our properties, our food & beverage business is not sustainable on a standalone basis in the current cost inflation environment without the support of stronger gaming revenues.

Tribal compacts have been steadily being amended to increase the wager limits at their properties. This proposal is modeled after those changes and reflects the same protections. Although a small percentage of the guests that visit cardrooms (less than 3%) would take advantage of the increase, these customers are a critical component of financial stability.

The effect of this rule change will be: The impact of allowing higher wagers will allow cardrooms to operate on a more level playing field. This will allow for the preservation of family wage jobs and economic contributions to the communities we are a part of. Additionally, it will provide increased tax collection for our local jurisdictions.

The results of this submission may be viewed at:

<https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwsgc.wa.gov%2Fnode%2F18%2Fsubmission%2F3434&data=05%7C01%7Crules.coordinator%40wsgc.wa.gov%7Ce7997907911b45dced108da6436f0d7%7C11d0e217264e400a8ba057dcc127d72d%7C0%7C0%7C637932484382140670%7CUnknown%7CTWFpbGZsb3d8eyJWlloiMC4wLjA%7CwMDAiLCJQljoiv2luMzliLCJBTiI6Ik1haWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sdata=kVwaszgnEUHfsvon4rID3Y7D%2FhtMa2wxMZVyL%2BMvqB4%3D&reserved=0>

**WAC 230-15-140 Wagering limits for house-banked card games. (1)**

A single wager must not exceed three hundred dollars.

(2) A player may make a single wager for each decision before the dealer deals or reveals additional cards. Wagers must be placed on the table layout on an approved betting spot, except for:

(a) In Blackjack games, players may place an additional wager next to their original wager when doubling down or splitting pairs; or

(b) Tip wagers made on behalf of a dealer; or

(c) As authorized in approved card games rules.

[Statutory Authority: RCW 9.46.070. WSR 21-11-057, § 230-15-140, filed 5/14/21, effective 6/14/21; WSR 08-20-025 (Order 631), § 230-15-140, filed 9/19/08, effective 1/1/09; WSR 07-09-033 (Order 608), § 230-15-140, filed 4/10/07, effective 1/1/08.]



OPTION A

AMENDATORY SECTION (Amending WSR 21-11-057, filed 5/14/21, effective 6/14/21)

**WAC 230-15-140 Wagering limits for house-banked card games.** (1)  
A single wager must not exceed (~~three hundred dollars~~) \$300. Provided that licensees may allow a single wager up to \$500 under the following conditions:

(a) All wagering limits greater than \$300 must be approved by us and included in the internal controls; and

(b) Only three house-banked tables may offer wagering limits greater than \$300; and

(c) The licensee must establish a designated space on the licensed premises for house-banked tables with wagering limits greater than \$300. The designated space must:

(i) Be separated from the main gaming space by a permanent structure or physical barrier; and

(ii) Function like a separate gaming pit from the main gaming space; and

(iii) Have a floor supervisor present at all times tables are open for play; and

(iv) Have a gambling disorder informational sign conspicuously posted which includes a toll-free hotline number for individuals with a gambling problem or gambling disorder; and

(d) Verify players are not on the self-exclusion list prior to allowing wagers greater than \$300.

(2) A player may make a single wager for each decision before the dealer deals or reveals additional cards. Wagers must be placed on the table layout on an approved betting spot, except for:

(a) In Blackjack games, players may place an additional wager next to their original wager when doubling down or splitting pairs; or

(b) Tip wagers made on behalf of a dealer; or

(c) As authorized in approved card games rules.

OPTION B

AMENDATORY SECTION (Amending WSR 21-11-057, filed 5/14/21, effective 6/14/21)

- WAC 230-15-140 Wagering limits for house-banked card games.** (1)  
A single wager must not exceed (~~three hundred dollars~~) \$500.
- (2) A player may make a single wager for each decision before the dealer deals or reveals additional cards. Wagers must be placed on the table layout on an approved betting spot, except for:
- (a) In Blackjack games, players may place an additional wager next to their original wager when doubling down or splitting pairs; or
  - (b) Tip wagers made on behalf of a dealer; or
  - (c) As authorized in approved card games rules.

OPTION C

AMENDATORY SECTION (Amending WSR 21-11-057, filed 5/14/21, effective 6/14/21)

**WAC 230-15-140 Wagering limits for house-banked card games.** (1)

A single wager must not exceed (~~three hundred dollars~~) \$400.

(2) A player may make a single wager for each decision before the dealer deals or reveals additional cards. Wagers must be placed on the table layout on an approved betting spot, except for:

- (a) In Blackjack games, players may place an additional wager next to their original wager when doubling down or splitting pairs; or
- (b) Tip wagers made on behalf of a dealer; or
- (c) As authorized in approved card games rules.

OPTION D

AMENDATORY SECTION (Amending WSR 21-11-057, filed 5/14/21, effective 6/14/21)

**WAC 230-15-140 Wagering limits for house-banked card games.** (1)  
A single wager must not exceed (~~three hundred dollars~~) \$500. Provided that licensees may allow a single wager greater than \$500 but not to exceed \$1,000 under the following conditions:

(a) All wagering limits greater than \$500 must be approved by us and included in the internal controls; and

(b) Only three house-banked tables may offer wagering limits greater than \$500; and

(c) The licensee must establish a designated space on the licensed premises for house-banked tables with wagering limits greater than \$500. The designated space must:

(i) Be separated from the main gaming space by a permanent structure or physical barrier; and

(ii) Function like a separate gaming pit from the main gaming space; and

(iii) Have a floor supervisor present at all times tables are open for play; and

(iv) Have a gambling disorder informational sign conspicuously posted which includes a toll-free hotline number for individuals with a gambling problem or gambling disorder; and

(d) Verify players are not on the self-exclusion list prior to allowing wagers greater than \$500.

(2) A player may make a single wager for each decision before the dealer deals or reveals additional cards. Wagers must be placed on the table layout on an approved betting spot, except for:

(a) In Blackjack games, players may place an additional wager next to their original wager when doubling down or splitting pairs; or

(b) Tip wagers made on behalf of a dealer; or

(c) As authorized in approved card games rules.

**Wager Limit Changes**

<u>Date/Year</u>	<b>POKER in:</b>			<u>HBCR</u>	<u>HBCR</u>	<u>Tribal</u>
	<u>Card room</u>	<u>Class F</u>	<u>HBCR</u>			
1974	\$2					
1977	\$5					
1990	\$10					
1991-1995 Phase I						13 tables @ \$10
						10 tables @ \$25
1991-1995 Phase II						9 tables @ \$10
						13 tables @ \$25
						1 table @ \$100
1995 Phase I						\$250
1995 Phase II						\$500
2000	\$25	\$25	\$25	New HBCR	\$25	
				Exper HBCR	\$100	
2003					\$100	
2004				limited tables	\$200	
2006					\$200	
2008	\$40	\$40	\$40		\$300	
2013	\$40	\$40	\$40			
	Texas Hold'Em only	\$100	\$100			
Sept 2016	\$40	\$100	\$300			
Dec 2016	\$40	\$300	\$300			
2021-current						\$500
Limitation Appendix						25% of tables @ \$1,000
						Limited, pre-screened \$5,000

## Lohse, Jess (GMB)

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**From:** Griffin, Tina (GMB)  
**Sent:** Thursday, August 11, 2022 1:31 PM  
**To:** Lohse, Jess (GMB)  
**Subject:** FW: Wager limit rule change petition  
**Attachments:** Wager limit rule change petition.pdf

Please put this with the HBCR rules file. It was read into the record of the Commission meeting on August 11, 2022.

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**From:** AgencyWebsite (GMB) <agency.website@wsgc.wa.gov>  
**Sent:** Thursday, August 11, 2022 8:05 AM  
**To:** Anderson, Julie (GMB) <julie.anderson@wsgc.wa.gov>; Griffin, Tina (GMB) <tina.griffin@wsgc.wa.gov>  
**Subject:** FW: Wager limit rule change petition

Nicole Frazer  
Administrative Assistant 3, CEU/Regulations  
Agency Evidence Officer & Agency ACCESS TAC  
Phone: 509-325-7905 Cell - 509-530-0743  
[Nicole.Frazer@wsgc.wa.gov](mailto:Nicole.Frazer@wsgc.wa.gov)

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**From:** Tony Johns - Chips & Palace Casinos <[tjohns@evergreengaming.com](mailto:tjohns@evergreengaming.com)>  
**Sent:** Wednesday, August 10, 2022 5:31 PM  
**To:** AgencyWebsite (GMB) <[agency.website@wsgc.wa.gov](mailto:agency.website@wsgc.wa.gov)>  
**Subject:** Wager limit rule change petition

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External Email

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To whom it may concern,

Please see the attached statement on behalf of Evergreen Gaming regarding the Table limit rule change petition on the agenda for the 8/11/22 meeting.

Thank you,

**Tony Johns**  
**General Manager**  
**Chips/Palace Casinos**  
**Lakewood, Wa**  
**253-720-8369**



Evergreen gaming wishes to support the submitted rules petition requesting that the maximum wager limits be increased to \$500 and \$1,000 limited to no more than three table games. Evergreen gaming believes that this rule change is necessary to continue to keep up with the increasing wage growth and skyrocketing inflation. Evergreen gaming wishes to remain competitive with its pay and benefits offerings throughout the food and entertainment industry. The \$500 table limits will play a vital role in doing this and the \$1,000 limits, on up to three table games will allow us to provide a desirable option to the top 3% of guests who currently go out of state where comparable limits are offered. We thank you for your consideration of this rule change and look forward to participating in future discussions on how to implement it most effectively in a way that promotes safe and responsible gaming.

Tony Johns

A handwritten signature in dark ink, appearing to read "Tony Johns", with a long, sweeping underline.

General manager

Chips Casino and Palace Casino

Lakewood, WA.

## December 1, 2022 - Maverick-provided spreadsheet on wagering limits in other states

State	Table Limit	Craps	Roulette	Baccarat	Website	Notes
Alabama	NA	NA	NA	NA		
Alaska	NA	NA	NA	NA		
Arizona	\$ 100,000	\$ 100,000	\$ 100,000	\$ 100,000	<a href="https://gaming.az.gov/">https://gaming.az.gov/</a>	Sports betting racetracks & OTBs
Arkansas	NA	NA	NA	NA	<a href="#">Arkansas Casino Gaming Rules   Department of Finance and Administration</a>	Horse racing only
California	Unlimited	Unlimited	Unlimited	Unlimited	<a href="http://www.cgcc.ca.gov/">http://www.cgcc.ca.gov/</a>	
Colorado	Unlimited	Unlimited	Unlimited	Unlimited	<a href="https://sbg.colorado.gov/gaming/limited-gaming">https://sbg.colorado.gov/gaming/limited-gaming</a>	
Connecticut	NA	NA	NA	NA		Sports betting Lottery retailers
Delaware	Unlimited	Unlimited	Unlimited	Unlimited	<a href="#">203 Video Lottery and Table Game Regulations (delaware.gov)</a>	Wagers set by licensee and approved by th agents. Sports betting lottery retailers and Racinos
Florida	NA	NA	NA	NA	<a href="#">Statutes &amp; Constitution :View Statutes : Online Sunshine (state.fl.us)</a>	Pari-mutuel Betting not house banked
Georgia	NA	NA	NA	NA		Only one casino cruise ship
Hawaii	NA	NA	NA	NA		
Idaho	NA	NA	NA	NA		Illegal
Illinois	Unlimited	Unlimited	Unlimited	Unlimited	<a href="https://www.igb.illinois.gov/">https://www.igb.illinois.gov/</a>	Wagers set by the licensee
Indiana	1,000/2,000	1,000/2,000	1,000/2,000	1,000/2,000	Called French Lick casino	Main wager/ high limit respectively
Iowa	NA	NA	NA	NA	<a href="#">Gaming Fees   Iowa Racing and Gaming Commission</a>	Pari-mutuel betting race tracks and river boats
Kansas	Unlimited	Unlimited	Unlimited	Unlimited	<a href="#">20120213_112-108-38.pdf (ks.gov)</a>	Set by licensee
Kentucky	NA	NA	NA	NA		Horse racing and slots only
Louisiana	Unlimited	Unlimited	Unlimited	Unlimited	<a href="http://lgcb.dps.louisiana.gov/">http://lgcb.dps.louisiana.gov/</a>	Set by licensee
Maine	NA	NA	NA	NA	<a href="#">Casino Statute and Rules - Gambling Control Unit (maine.gov)</a>	Electronic table games only
Maryland	\$500	\$500	\$500	\$500	Called Rocky Gap Casino	
Massachusetts	\$1,000	\$1,000	\$1,000	\$1,000	Called MGM Springfield Casino	
Michigan	Unlimited	Unlimited	Unlimited	Unlimited	Called MGM Detroit Casino	Must be approved by their Agents
Minnesota	NA	NA	NA	NA	<a href="#">Home   Minnesota Gambling Control Board (mn.gov)</a>	Charitable gaming only
Mississippi	Unlimited	Unlimited	Unlimited	Unlimited	Pearl River Resort	Must be approved by their Agents
Missouri	Unlimited	Unlimited	Unlimited	Unlimited	<a href="#">MISSOURI GAMING COMMISSION (mo.gov)</a>	
Montana	Poker - Pot Limit of \$800	NA	NA	NA	<a href="https://rules.mt.gov/gateway/ChapterHome.asp?Chapter=23%2E16">https://rules.mt.gov/gateway/ChapterHome.asp?Chapter=23%2E16</a>	Non Tribal Poker Only
Nebraska					<a href="https://revenue.nebraska.gov/">https://revenue.nebraska.gov/</a>	Sports betting Racinos only
Nevada	Unlimited	Unlimited	Unlimited	Unlimited	<a href="https://gaming.nv.gov/">https://gaming.nv.gov/</a>	
New Hampshire	NA	NA	NA	NA	<a href="#">Welcome   NH Racing and Charitable Gaming Commission</a>	Sports betting, Lottery and Charitable gaming
New Jersey	Unlimited	Unlimited	Unlimited	Unlimited	Called Borgata Casino in Atlantic City	Gaming notified.
New Mexico	NA	NA	NA	NA	<a href="#">Regulations   New Mexico Gaming Control Board (nm.gov)</a>	
New York	NA	NA	NA	NA	<a href="#">NYS Gaming Commission : Gaming</a>	Electronic table games only
North Carolina	NA	NA	NA	NA		Tribal, bingo, raffles and charitable
North Dakota	NA	NA	NA	NA	<a href="#">Gaming   Attorney General (nd.gov)</a>	Charitable, online tribal and lottery
Ohio	\$5,000	\$5,000	\$5,000	\$5,000	Jack Casino Cleveland	
Oklahoma	NA	NA	NA	NA		
Oregon	NA	NA	NA	NA	<a href="https://www.doj.state.or.us/charitable-activities/charitable-gaming/charitable-gaming-license-applications-and-reports/">https://www.doj.state.or.us/charitable-activities/charitable-gaming/charitable-gaming-license-applications-and-reports/</a>	Sports betting lottery retailers and online
Pennsylvania	Unlimited	Unlimited	Unlimited	Unlimited		In person and iGaming
Rhode Island	10000	200	200	10000		
South Carolina	1000	500	500	NA		Boat only
South Dakota	1000	1000	1000	1000	<a href="https://dor.sd.gov/businesses/gaming/sd-commission-on-gaming/">https://dor.sd.gov/businesses/gaming/sd-commission-on-gaming/</a>	
Tennessee	NA	NA	NA	NA		Sports betting online only
Texas	NA	NA	NA	NA	<a href="https://statutes.capitol.texas.gov/Docs/CN/htm/CN.3.htm#3.47">https://statutes.capitol.texas.gov/Docs/CN/htm/CN.3.htm#3.47</a>	
Utah	NA	NA	NA	NA		
Vermont	NA	NA	NA	NA		
Virginia	50000	50000	50000	50000		
Washington	300	NA	NA	300	<a href="https://www.wsgc.wa.gov/">https://www.wsgc.wa.gov/</a>	
Washington, D.C.	NA	NA	NA	NA		
West Virginia	Unlimited	Unlimited	Unlimited	Unlimited	<a href="http://www.wvlegislature.gov/WVCODE/Code.cfm?chap=29&amp;art=22C#22C">http://www.wvlegislature.gov/WVCODE/Code.cfm?chap=29&amp;art=22C#22C</a>	Must be approved by state lottery commission
Wisconsin	No	No	No	No		
Wyoming	No	No	No	No		Sports betting online only



## **Follow up to questions posed by WSGC member to Maverick Gaming petition to increase wager limits**

The following QA includes the queries mentioned in public meetings and other correspondence specific to Maverick Gaming's request for an update to regulations to allow a wager increase for Washington cardrooms.

### **Historical foundation:**

The Washington State Legislature Passed [SHB 473](#) in 1974 to allow cardrooms. Significant updates to the initial law have occurred only four times since 1981.

- 1981 – Allowance for a local tax on card room revenue increased from 5% to 20% (there is no state tax on gambling). Fees from card rooms support the operations of its regulatory body, the Washington State Gambling Commission. [SB 3307](#)
- 1996 – Card rooms expanded from 5 tables to 15 tables. [SB 6430 bill page](#). Bill Text
- 1997 – Nontribal House-banked card rooms approved. [SB 5560 bill page](#).
- [Bill Text](#)
- 2006 – Wager limits for card rooms increased to \$200 at all tables. Previously, a \$200 wager limit was only allowed at three tables per card room.
- 2007 – Rules published in the [Washington State Register](#) by the Washington State Gambling Commission, defining the sale of food and drink by card game licensees as a “commercial stimulant” that should not be included in gross gambling receipts:
  - “If card game licensees prepare and provide food and drink as a part of the entry fee, they may treat the fair market value of the food and drink as commercial stimulant sales and not include it as gross gambling receipts.”
- 2008 – Card rooms allowed to expand hours to operate seven days a week, 24 hours per day. Previously, card rooms were only authorized to operate 20 hours per day.
- 2009 – Wager limits for card rooms increased to \$300 at all tables. Previously, a wager limit of \$200 was in place for all tables.
- 2012 – Card rooms authorized to offer carryover pots for up to 10 games. This was previously not authorized. Wager limits for “Texas hold ‘em” games raised from \$40 to \$100.

### **QA**

***How did you arrive at your request for \$500 limits from \$300 limits? How does chain inflation factor into this? What are the impacts of inflation on cardroom operations?***

- Minimum wage in 2009 was \$8.55 when wager limit increased from \$250 to \$300.

- Minimum wage in 2022 is \$14.49 now which is 1.69x of 2009 would point to an the increase of close to \$508. We rounded it down to \$500.
- Minimum wage is going to be \$15.74 next year but we think \$500 is still reasonable.

Washington's card rooms are a legal, regulated participant in our state's economy and the laws and rules governing their operation should reflect the economic reality of the times.

- The impact of inflation has driven operating costs have been greatly affecting stability
  - Food & Beverage
    - Food, beverage, and liquor are significant in cost to our operations. Attached food items we paid in 2019 has now increased by +50% this year. The same buffet menu we offered in 2019 costs **60% more to do now**. **A list of current price sheet will be provided separately.**
  - Gaming Equipment
    - Two of our essential and most used gaming equipment, playing cards and gaming chips, have a significant jump on the price under the inflation
      - Playing cards up from \$0.80 per deck to now \$1.66 per deck, a **107.5% increase**
      - Gaming chips up from \$1.39 (qty 2,000) and \$0.78 (qty 3,000) to \$2.54 (qty 2,000) and \$2.28 (qty 3,000). **82.7% increase in cost**
  - Supply shortage
    - The shortage has been another factor to drive the cost increase because when we cannot receive, for example, ketchup in time from our supplier we will need to shop around wherever there's a supply. The imbalance in supply and demand naturally grants the product to whom pays more and that inevitably drove up our cost to supply products to our guests.
    - Freight is the other factor that has put more weight on the increase of product costs
  - Payroll
    - This data of min wage increase has been addressed in prior meeting and with another new 8.6% increase, effective January 2023, is going to make it harder to operate in a healthy margin
    - To get people hired, the cost is much higher than the min wage increase. We are competing with other employers for the same pool of workable source in WA, where the living costs is on the top list across the nation's 50 states. McDonald is hiring at \$23.00 while they were able to increase a Big Mac combo from \$9 to \$13.50 now to justify the payroll increase.
    - Due to COVID, the employee insurance cost has also increased from the claims and premium by insurance company.

***How will tier 1, 2 and 3 supplies be impacted by this proposed increase in wager limits?***

***How have the statutes and rules evolved for "social card games" and "commercial stimulants"?***

The laws and rules governing social card games have been updated by the Legislature and the Washington State Gambling Commission since their creation in 1974 to reflect the economic reality of the times. *Please see “A Brief History of Gambling in Washington” for a general timeline and contextual information.*

Social card games were first defined in statute in [SHB 473](#), adopted in 1974, as a regulated gaming option available for bona fide charitable or non-profit organizations. Social card games were also available to any person, organization or association when utilized as a commercial stimulant. In 1987, the Legislature in adopting [HB 6](#) determined the definition of “commercial stimulant” relating to social card games as: “an activity that is an incidental activity operated in connection with, and incidental to, an established business, with the primary purpose of increasing the volume of sales of food or drink for consumption on that business premises.”

Following the opening of the first Tribal casinos in 1992, the Legislature in a 95-0 vote in the House and a 35-14 vote in the Senate defined “commercial stimulant” as no longer secondary or incidental to an established business. In adopting [HB 2382](#), the Legislature revised the definition of “commercial stimulant” relating to social card games, striking the two instances of the word “incidental” and one of “primary.” “‘Commercial stimulant,’ as used in this chapter, means an activity is operated as a commercial stimulant, for the purposes of this chapter, only when it is an ~~incidental~~ activity operated in connection with, ~~and incidental to~~, an established business, with the primary purpose of increasing the volume of sales of food or drink for consumption on that business premises.”

In 1996 and 1997, the definition of social card games was again updated by the Legislature to increase the maximum number of tables from five to 15 and to allow for house-banked card rooms. According to legislative records, testimony, and a review of floor speeches by lawmakers, the Legislature was responding to a desire to allow card rooms to remain a competitive business. The Commission engaged in corresponding rulemaking to adopt the regulations governing the operation of house-banked card rooms.

Additional rulemaking after the creation of house-banked card rooms includes four updates to the wager limits allowed for house-banked card rooms from 2006 to 2012. Finally, in 2007, [rules](#) published by the Washington State Gambling Commission defined the sale of food and drink by card game licensees as a “commercial stimulant” that should not be included in gross gambling receipts.

When first created by the Legislature in 1974, social card games were defined as an ancillary operation to help stimulate the commercial or non-profit operations of a primary business or organization. Since 1974 – and especially since the opening of the first Tribal casinos in Washington - the Legislature has made multiple updates to the definition of social card games in statute so that they are now operated as primary for-profit commercial businesses, often with a corresponding secondary business of food and drink. The Commission has also reflected this definition in statute in its rulemaking, both in increasing wager limits to reflect the economic reality of the times and categorizing gross receipts for tax purposes.

***Please provide more detail for the assertion that in the 1990’s the legislature chose expansion for card rooms (5-15 tables and allowance of house banked cardrooms).***

In 1996, the state legislature approved the expansion from five tables to 15 tables for cardrooms. ([SB 6430 bill page](#). [Bill Text](#)) The Senate Bill report reads as follows:

This legislation as introduced in the Senate would expand tables from 5 to 15 and allow for house-banked card rooms. However, a substitute bill removed allowing house-banked card rooms and replaced that provision by allowing for player-supported progressive prize contests. After passing the Senate, the House attached an amendment to provide the Commission \$1 million from the General Fund. After passing the House, the Senate refused to concur, and the House receded from the amendment before again passing the bill (this time with 5 more yay votes).

**Testimony against:** Dick Dorsett, Pierce County; Maureen Morris, Association of Cities.

**Testimony for:** Senator Schow, prime sponsor; Steven Downen, Riverside Inn; George Teeney, card room operator; Dave Pardee, Skyway Bowl; Robert Saucier, Mars Hotel; Fred Steiner, Diamond Lil's; Art Lawerson, Cafe International; Lou Dales, Tower Inn

**Senate sponsors:** Schow, Spanel

**House sponsors:** Thompson, Quall, Thomas, L., Clements, Schmidt, Blanton, Buck, Schoesler, Cairnes, Conway

***Senate approved 30-14-5, House approved 78-13-7 on first vote, 83-15-0 on second vote.***

✓ Governor signed (Lowry)

In 1997 the state legislature established house-banked, nontribal cardrooms. ([SB 5560 bill page](#). [Bill Text](#))

House Bill Testimony Summary: "The house would make more money acting as the banker. The commission would still set wagering limits and establish the number of tables up to the maximum allowed under current law. This bill will allow card rooms to compete with the tribal casinos."

Relevant testimony from TVW's archives includes the following:

[Senate Floor Debate](#) - ~35:00 – Sen. Schow says that the update was so that the Commission would know everyone who is participating in a game.

[No mention of commercial stimulant.]

[House Floor Debate](#) - ~1:07:00 – Rep. McMorris says that the update is needed so not just anyone can bank a game and will allow owners of card rooms to make sure the games are run well. Rep. Wood says this will help a lot of the small card rooms

[House Bill report](#)

**No testimony against.** Pro Testimony: Steve Down, Recreational Gaming Association; Rob Saucier, Mars Hotel; and Julia Porter, Eddie's Diner.

**Senate Sponsors:** Schow, Prentice, Snyder, Anderson, Horn

**House Sponsors:** Cairnes, Hatfield, Conway, Fisher, Zellinsky

***Senate Approved 44-1, House Approved 97-0***

✓ Governor signed (Locke)

***How are house-banked card rooms (HBCRs) marketing themselves currently?***

Like restaurants, theaters, and sports, playing cards is one choice people have for entertainment. For those who gamble, playing cards at a neighborhood destination is marketable for a relaxed, convenient environment, programs that offer loyalty discounts, a good meal, community connection. We are the local Cheers bar.

Just as a movie theater markets itself as a destination for watching movies, house-banked card rooms market themselves as a destination for playing cards.

***What triggers, strings, and centers of influence should determine, beyond the economic factors, when and why we raise limits in HBCRs?***

For every sector in every industry, economic factors and time are key and determining factors for updates to regulation. An unchanging, stagnant environment over time is not a reality for any sector. That reality is fundamental for our request to increase wager limits. Customer choice, customer autonomy, the standard need for any business in the entertainment or hospitality industry to evolve to meet its customer's needs (or lose their business) is very much at the crux of increased wager limits at cardrooms.

A regulated utility raises rates to ensure its services meet the needs of its customers. A regulated sector such as liquor and spirits asks for permission to include tasting rooms in distilleries to respond to customer demand. Regulated providers for broadband access must ask for permission to build new infrastructure that responds to both consumer demand and the requirements of technology to function properly on its networks. Those with liquor licenses ask for the allowance to provide outdoor "café" service and food truck operators advocate for updates to parking regulations. In every instance, the needs of the people who use, enjoy, and rely on the service should be accommodated safely and responsibly in regulation. The *opposite* action, limited or reticent updates to the rules, affects the choice, control, and costs for consumers first and above everything else.

Historically the Gambling Commission has followed the Legislature's lead in updating wager limits to reflect the ongoing economic and competitive evolution of gambling in our state. Cardrooms are a legal participant in our state's economy and the laws and rules governing their operation should reflect the economic reality of the times. Updates that respect the cardroom industry have been updated a total of four times since 1981. In 2022, an update is reasonable.

Inflation impacts the operations of card rooms much like it impacts the operations of any commercial business. For card rooms, inflation drives up the cost of essential items such as poker chips and cards, the wages of employees, health care benefits and food costs.

***Is there a comparison between Washington cardrooms and Tribal casinos?***

No. Cardrooms do not compete with Tribal casinos on any aspect of business, except for the card players at the 15 tables they are allowed to host. 90% of cardroom customers live within 3 miles and can drop by to watch the game and meet friends for beers and burgers, or to play cards somewhere that is local and familiar. Washington cardrooms are modest both in physical footprint and gaming choices that we may offer local customers. Each property has a maximum of 15 card tables. In addition to state regulations,

card rooms have to comply with local requirements around zoning and taxes. Class III gaming, such as slots, are not available at our properties in Washington. Each card room is tailored for its neighborhood, often featuring a bar, kitchen, and regular events (such as a drag show brunch at a location in Tukwila), for its customers.

Except for the handful of card games that can be played at a Washington cardroom or at a Tribal casino, the enterprises are vastly different in scale and offerings.

***Is Maverick Gaming owned by out-of-state, maybe even foreign investors from other countries?***

No. Maverick's finances, and those of its owners, are required to be disclosed to and vetted in detail by the State Gambling Commission, a regulatory requirement designed to identify and prevent corruption in the industry. Maverick Gaming's \$500 million investment in the state, and each enterprise it owns and operates (including LLCs it purchased), does so under the Maverick Gaming umbrella, which is based in Kirkland, Washington. References to LLCs in the public record that are owned and operated by Maverick Gaming but based outside of Washington may be described as a "foreign entity LLC." This means that it is a property operating elsewhere in the United States, such as Colorado or Nevada. It does not mean that it is a business own or operated outside of the United States.

In addition to disclosing its source of funds as required by its regulator, Maverick Gaming also publicly shares information on its financing on its website via [press release](#): Deutsche Bank, Credit Suisse, Jefferies Group and US Bank. A review of records provided by the Washington State Gambling Commission confirms that Maverick Gaming's financing is analogous to financing of Tribal casinos in Washington.



## A Brief History of Gambling in Washington State

### 1971-1986

When card rooms were first authorized by the Legislature, the parameters of their operations reflected their times: gambling was newly legal in Washington following a public vote and a cautious Legislature sought to bring gambling out of the corrupt shadows while stopping well short of Las Vegas style gambling.

### 1987-2006

When Tribal casinos first opened their doors and significantly changed the gambling sector in Washington, the Legislature again updated the parameters for commercial card rooms to reflect the times: additional tables and the ability for house-banked operations.

- "Commercial stimulant" definition revised by Legislature so that cardrooms no longer defined as a secondary business or "incidental" to another operation.

### 2006-TODAY

The Commission has subsequently followed the Legislature's lead in updating wager limits to reflect the ongoing economic and competitive evolution of gambling in our state.

Like restaurants, theatres and sports events, playing cards is one choice people have for entertainment. Over the past 50 years, the Legislature has adopted policy and the Washington State Gambling Commission has enacted rules that affirm the ability of cardrooms to operate in an evolving business environment, including after the launch of now several thriving Las Vegas style Tribal casinos.

**1971** – The Legislature adopts HB 291 to create broad framework for legal gambling in Washington. Governor vetoes the legislation.

**1972** – [SJR5](#) approved by WA voters (61.67-38.33), the measure repealed the prohibition against lotteries and instituted a requirement of a supermajority vote via the legislature or

a ballot measure to conduct one. The measure amended [Section 24 of Article II](#) of the Washington State Constitution.

**1973** – Gambling Commission created. Legislature authorizes pull tabs, bingo, raffles, card rooms and "Las Vegas Night" fund-raisers. Governor vetoes card rooms [SHB 711](#).

*As passed by the Legislature, SHB 711 included card rooms and social card games, but Governor Evans used his line item veto to strip the bill of card rooms and social card games. He argued that "It is clear from the last election that the people desire bingo and raffles. However, I believe that we should proceed to establish the gambling commission and allow it to experience in this area before moving further direction of allowing other activities."*

**1974** – Card rooms approved – [SHB 473](#) – (emergency clause attached but vetoed. Certain aspects of card games also vetoed e.g. entrance fee)

*"The legislature hereby authorizes any person, association or organization to conduct social card games and to utilize punch boards and pull-tabs as a commercial stimulant."*

*Governor Evans again used his line item veto for aspects of the bill concerning card rooms. While allowing the new authorization this time to proceed, he vetoed language that he believed would make it too easy to host a card game, saying "These items all for public card rooms which pose serious problems of have the effect of paving the way enforcement to local police officials and foster a climate of open tolerance and/or clandestine payoffs for non- enforcement of gambling laws and regulations."*

*The Legislatures bill also blocked any local jurisdiction from imposing a ban on card rooms. Evans vetoed this language. He also vetoed the emergency clause.*

*The Commission maintains a [list of local bans](#).*

**1980** - [Gamscam](#)

**1981** – Allowance for a local tax on card room revenue increased from 5% to 20% (there is no state tax on gambling). Fees from card rooms support the operations of its regulatory body, the Washington State Gambling Commission. [SB 3307](#)

**1982** – Legislature authorizes state lottery (budget crisis - \$235 million deficit). [HB 1251](#)

**1987** – The Legislature recodifies existing statutes regulating gambling, creating new definitions and other updates. In a new section, the Legislature in adopting [HB 6](#) determined the definition of "commercial stimulant" relating to social card games as:



*“an activity that is an incidental activity operated in connection with, and incidental to, an established business, with the primary purpose of increasing the volume of sales of food or drink for consumption on that business premises.”*

**1988-92** – Congress authorizes Indian Gaming Regulatory Act, Tulalips and Lummi first Tribes in WA to complete compact negotiations and open their casinos in 1992.

**1994** – Activities defined as a “commercial stimulant” are no longer defined as only secondary or incidental to an established business. By a 95-0 vote in the House and 35-14 vote in the Senate, the Legislature amends in [HB 2382](#) the definition of “commercial stimulant” relating to social card games, striking the two instances of the word “incidental” and one of “primary:”

*“Commercial stimulant,’ as used in this chapter, means an activity is operated as a commercial stimulant, for the purposes of this chapter, only when it is an ~~incidental~~ activity operated in connection with, ~~and incidental to,~~ an established business, with the ~~primary~~ purpose of increasing the volume of sales of food or drink for consumption on that business premises.”*

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[Bill Text](#)

#### [Senate Bill report](#)

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Testimony against: Dick Dorsett, Pierce County; Maureen Morris, Association of Cities.

Testimony for: Senator Schow, prime sponsor; Steven Downen, Riverside Inn; George Teeney, card room operator; Dave Pardee, Skyway Bowl; Robert Saucier, Mars Hotel; Fred Steiner, Diamond Lil’s; Art Lawerson, Cafe International; Lou Dales, Tower Inn

Senate sponsors: Schow, Spanel

House sponsors: Thompson, Quall, Thomas,  
L., Clements, Schmidt, Blanton, Buck, Schoesler, Cairnes, Conway

Senate approved 30-14-5

House approved 78-13-7 on first vote, 83-15-0 on second vote.

Governor signed (Lowry)

**1997** – Nontribal House-banked card rooms approved, adding “house-banked” to definition of social card games. [SB 5560 bill page](#).

[Bill Text](#)

[House Bill Testimony Summary](#): “The house would make more money acting as the banker. The commission would still set wagering limits and establish the number of tables up to the maximum allowed under current law. This bill will allow card rooms to compete with the tribal casinos.”

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[House Bill report](#)

No testimony against. Pro Testimony: Steve Down, Recreational Gaming Association; Rob Saucier, Mars Hotel; and Julia Porter, Eddie’s Diner.

Senate Sponsors: Schow, Prentice, Snyder, Anderson, Horn  
House Sponsors: Cairnes, Hatfield, Conway, Fisher, Zellinsky  
Senate Approved 44-1, House Approved 97-0  
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**2006** – Wager limits for card rooms increased to \$200 at all tables. Previously, a \$200 wager limit was only allowed at three tables per card room.

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*“If card game licensees prepare and provide food and drink as a part of the entry fee, they may treat the fair market value of the food and drink as commercial stimulant sales and not include it as gross gambling receipts.”*

**2008** – Card rooms allowed to expand hours to operate seven days a week, 24 hours per day. Previously, card rooms were only authorized to operate 20 hours per day.

**2009** – Wager limits for card rooms increased to \$300 at all tables. Previously, a wager limit of \$200 was in place for all tables.

**2012** – Card rooms authorized to offer carryover pots for up to 10 games. This was previously not authorized. Wager limits for “Texas hold ‘em” games raised from \$40 to \$100.



**Rule Petition to Amend**  
WAC 230-14-260- Inventory control

**JANUARY 2023 – Final Action**  
**NOVEMBER 2022 – Discussion and Possible Filing**  
**AUGUST 2022 – Initiated Rulemaking**  
**JUNE 2022 – Rule-Making Petition Received**

**Tab 7: NOVEMBER 2022 Commission Meeting Agenda.**

**Statutory Authority 9.46.070**

**Who Proposed the Rule Change?**

Taek Kim, owner of Meeker St Bar & Grill in Kent, Washington

**Background**

**BOLD = Changes made after November 2022 Commission Meeting.**

At the August 2022 meeting, Commissioners accepted a petition and chose to initiate rule-making to amend rules related to pull-tab inventory control, specifically where “date in play” information from pull-tab games must be recorded. **At the November 2022 meeting, Commissioners chose to file draft language for further discussion. Today, this language is before you for final action.**

Before you today is draft language which:

- Amends the requirement of pull-tab operators to write the date they place a pull-tab series in play on the purchase invoice. Alternatively, the pull-tab operator may write the date they place a pull-tab series in play on the game’s flare; and
- Clarifies what records pull-tab operators must record I.D. stamp numbers on. The previous requirement was vague simply referring to “in all records”; and
- Eliminates duplicative language related to distributors and invoice requirements. This information is already in WAC’s 230-16-190 and 195; and
- Amends language referring to I.D. stamps for consistency within the rule.

Taek Kim, owner of Meeker St Bar & Grill in Kent, Washington is proposing to amend WAC 230-14-260 to no longer require licensed pull-tab operators to write the date they put a pull-tab series in play on the purchase invoice. The petitioner specifically wants to strike subsection (2) (b) of WAC 230-14-260.

The petitioner feels this change is needed because the requirement to write the date they place every pull-tab series in play on purchase invoices adds additional hardships for operators who do not use pull-tab point of sale/inventory systems. The petitioner noted that many operators already write the “date in play” information on the flare of the game or other separate tracking records after they place games in play. The petitioner feels that writing the date in play information also on the purchase invoices is duplication and not efficient. Furthermore, the petitioner feels that the date in play information written on purchase invoices does not add value to inventory control.

The petitioner feels that amending the rule in question will be positive for pull-tab operators who do not use pull-tab point-of-sale/inventory systems because it will save them time from trying to find pull-tab games on purchase invoices to write the date in play.

Attachments:

- Petition
- WAC 230-14-260

**Policy Considerations**

Staff has the following policy concerns:

- If pull-tab operators are no longer required to write the “date in play” information on purchase invoices, how will an operator know when they place each pull-tab series in play? Operators are required to write the date in play information on required monthly records, however, operators do not write that information on the record until after they pull a game from play. Some pull-tab games are in play for months before they are finally pulled from play.
- Some operators write the date in play information on the pull-tab game’s flare after they place it in play, however, that is not required by any rule. Some operators also write the date in play information on other tracking records separately prepared by the operator, however, that is also not required by any rule. If subsection (2) (b) of WAC 230-14-260 is removed, there will be no rule to require pull-tab operators to record the date in play information on any record.
- Operators that use point-of-sale/inventory systems are not required to write in ink the date in play information on purchase invoices. However, they still must type in the date in play information into the computerized system for game tracking purposes and so that the required monthly income summary can be generated with the information. The advantage of the computerized system is that the operator does not have to look through possibly dozens of pages of purchase invoices to find a single game to write the date in play information on.

**Staff Recommendation**

**Staff recommends final action be taken, making the rules effective 31 days after filing with the Office of the Code Reviser.**

**WAC 230-14-260 Inventory control.** (1) Punch board and pull-tab operators must control and account for each punch board and pull-tab series they obtain. Operators must:

(a) Enter the I.D. stamp numbers for the series (~~(in all records)~~) on purchase invoices and monthly income summaries; and

(b) Attach the packing slip to the original invoice if the pull-tab series is packed in more than one container; and

(c) Record each pull-tab dispenser they purchase (~~(-~~

~~(2) Distributors must record every purchase of punch boards or pull-tabs on an invoice. Operators must use this record to account for each series between the time they purchase it and the time they remove it from play. Invoices must include space for the operator to attach:~~

~~(a) The I.D. stamp numbers for each board or series; and~~

~~(b) The date they placed the punch board or pull-tab series out for play.~~

~~(3)); and~~

(d) Record the date they place each series in play on a purchase invoice. Alternatively, operators may record the date they place each series in play on the game's flare.

(2) When operators receive punch boards or pull-tab series, they must ensure that the manufacturer or distributor recorded all required data by comparing the (~~(Washington state identification))~~ I.D. stamp number attached to each punch board and pull-tab series to the number recorded on the purchase invoice.

~~((4))~~ (3) Operators may use a separate computerized inventory record as long as they:

(a) Use an I.D. stamp or print a computer generated facsimile of the I.D. stamp number on the inventory record; and

(b) Record all other required information.



STATE OF WASHINGTON  
GAMBLING COMMISSION

*"Protect the Public by Ensuring that Gambling is Legal and Honest"*

January 5, 2023

**TO:**           **COMMISSIONERS**  
                  Alicia Levy, Chair  
                  Julia Patterson, Vice-Chair  
                  Bud Sizemore  
                  Sarah Lawson  
                  (vacancy)

**EX OFFICIO MEMBERS**  
                  Senator Steve Conway  
                  Senator Jeff Holy  
                  Representative Shelley Kloba  
                  (vacancy)

**FROM:**       Lisa C. McLean, Legislative and Policy Manager

**SUBJECT:    JANUARY 2023 LEGISLATIVE UPDATE**

The regular 105-day session begins on Monday, January 9, 2023. On December 21, 2022, Senators Pedersen and Short pre-filed Senate Concurrent Resolution 8401, which – if adopted – will establish the following cutoff dates for the 68<sup>th</sup> Legislature:

<b>Proposed 2023 Cutoff Calendar</b>		
40 <sup>th</sup> day	Policy Committee Cutoff – House of Origin	Friday, February 17
47 <sup>th</sup> day	Fiscal Committee Cutoff – House of Origin	Friday, February 24
59 <sup>th</sup> day	House of Origin Cutoff	Wednesday, March 8
80 <sup>th</sup> day	Policy Committee Cutoff – Opposite House	Wednesday, March 29
86 <sup>th</sup> day	Fiscal Committee Cutoff – Opposite House	Tuesday, April 4
94 <sup>th</sup> day	Opposite House Cutoff (after 5pm, only initiatives to the legislature and alternatives to such initiatives, budgets and matters necessary to implement budgets, matters that affect state revenue, messages pertaining to amendments, matters of differences between the two houses and matters incident to the interim and to the closing of the session may be considered)	Wednesday, April 12
105 <sup>th</sup> day	Last day allowed for regular session	Sunday, April 23

The February public meetings will be the best opportunity for you to review any relevant gambling or agency bills to help set our agency priorities for the 2023 session.

As of this writing, approximately 170 bills have been pre-filed. So far, none of the bills have any direct gambling-related impacts. In the area of law enforcement, a number of pre-filed bills have the potential to impact law enforcement operations – and staff will continue to keep an eye on these bills. Commission staff has heard of some bills that may be filed; and, given the cutoff calendar, the February public meeting will likely be the best opportunity for Commissioners to review any bills impacting the Gambling Commission.

Earlier this month, Governor Inslee signed off on our agency-request legislation, Concerning oversight and training requirements for limited authority Washington peace officers and agencies; and staff is lining up sponsors and co-sponsors with the expectation of having a pre-filed bill by the time the Commission meets in January. The plan is for the House to introduce the bill in the Community Safety, Justice and Reentry Committee, send it through the House Appropriations Committee, and then have it sent to the Senate.

While still requiring formal adoption, the press has reported on news from each of the caucuses related to committee names and assignments. In both the Senate and the House, the leadership has chosen to make changes to the names of the committees that oversee the work of the Gambling Commission. In the Senate, the commission will fall under the Business, Financial Services, Gaming & Trade Committee to be chaired by Senator Derek Stanford (1<sup>st</sup> LD) and co-chaired by Senator Noel Frame (36<sup>th</sup> LD) with Senator Perry Dozier (16<sup>th</sup> LD) serving as ranking member. In the House, there will be a newly named Committee on Regulated Substances & Gaming to be co-chaired by Representative Shelley Kloba (1<sup>st</sup> LD) and Representative Sharon Wylie (49<sup>th</sup> LD) with Representative Kelly Chambers (25<sup>th</sup> LD) serving as ranking member.

The chart below lists all prospective members of each committee.

<b>Senate – Business, Financial Services, Gaming &amp; Trade</b>	<b>House – Regulated Substances &amp; Gaming</b>
Derek Stanford – 1 <sup>st</sup> LD, Chair	Shelley Kloba – 1 <sup>st</sup> LD, Co-Chair
Noel Frame – 36 <sup>th</sup> LD, Co-Chair	Sharon Wylie – 49 <sup>th</sup> LD, Co-Chair
Bob Hasegawa – 11 <sup>th</sup> LD	Melanie Morgan – 28 <sup>th</sup> LD
Mark Mullet – 5 <sup>th</sup> LD	Tina Orwall – 33 <sup>rd</sup> LD
Jamie Pederson – 43 <sup>rd</sup> LD	Kristine Reeves – 30 <sup>th</sup> LD
Perry Dozier – 16 <sup>th</sup> LD, Ranking	Chris Stearns – 47 <sup>th</sup> LD
Matt Boehnke – 8 <sup>th</sup> LD	Kelly Chambers – 25 <sup>th</sup> LD, Ranking
Chris Gildon – 25 <sup>th</sup> LD	Eric Robertson – 31 <sup>st</sup> LD, Asst. Ranking
Rob MacEwen – 35 <sup>th</sup> LD	Michelle Caldier – 26 <sup>th</sup> LD
	Jim Walsh – 19 <sup>th</sup> LD
	Kevin Waters – 17 <sup>th</sup> LD

More bills may be filed before the January Commission Meeting and, certainly, before the February Commission Meeting. I will be prepared with an update on relevant bills and possible action during the public meetings.