

## Exhibit X.A.6 – Historical Efforts Against Problem Gambling

---

*Submit as Exhibit X.A.6. a description of the processes proposed to address problem gambling at the other facilities it owns or controls, the effectiveness of those processes, and the metrics the Applicant will use to determine the effects.*

### **Current processes to address problem gambling at Saratoga Casino and Raceway and Churchill Downs facilities**

Saratoga Casino and Raceway and Churchill Downs Incorporated have implemented a number of processes enterprise-wide to address problem gambling and adhere to State codes, rules, regulations, and recommendations. To help raise the awareness and enforcement of our problem gambling initiatives we have enlisted advances in technology, advertising support, strict self-exclusion policies, on-property promotion and exposure, as well as annual and recurring employee training.

In accordance with the AGA Code of Conduct, we have pledged to our employees, our patrons, and the community to make responsible gaming an integral part of our daily operations. Those pledges include:

### **Pledge to the Public**

#### **To Support and Promote Research-Based Policies on Responsible Gaming**

- On November 15, 2013, SCR met with and participated in a site visit conducted by representatives from the New York Council on Problem Gambling to review our responsible gaming policies, practices, and procedures. This meeting resulted in a set of responsible gaming best practice recommendations which were immediately added to our efforts to educate patrons, employees and policy-makers.

#### **To Provide Oversight and Review**

- We created a staff position at all of our properties to assure we ardently comply with all problem gambling and responsible gaming regulation. At each property our Director of Compliance conducts regular reviews and augments training programs with new material and works with our leadership teams to continually evolve our program in connection with subject matter experts. The Director of Compliance also partners with the state agencies in each state where we operate to provide refresher training and promote new sources of support and assistance for those in need.

### **Pledge to Our Employees**

- We educate new employees about responsible gaming and the challenges some people face at every new hire orientation session.
- We train gaming floor employees about the proper ways to identify potential signs of trouble and how to properly engage in healthy conversations with guests that may be demonstrating some similar behaviors.
- We provide periodic refresher training so responsible gaming stays top of mind.
- We implement communications programs for employees to improve their understanding of responsible gaming and related policies and procedures.

## Exhibit X.A.6 – Historical Efforts Against Problem Gambling

---

*Submit as Exhibit X.A.6. a description of the processes proposed to address problem gambling at the other facilities it owns or controls, the effectiveness of those processes, and the metrics the Applicant will use to determine the effects.*

- We provide information to new and existing employees about responsible gaming and where to find assistance.
- We post responsible gaming awareness information, including the toll-free 1-877-8-HOPENY help-line number, at various locations where employees congregate.

### **Pledge to Our Patrons**

#### **To Promote Responsible Gaming**

- We make information available promoting responsible gaming and where to find assistance, including the toll-free 1-877-8-HOPENY help-line number. This information is available and visible on casino floors and at cash access devices throughout our properties.
- Our websites provide information describing responsible gaming, our policies and practices related to responsible gaming and where to find assistance.
- We have policies in place for all of our casino properties providing opportunities for patrons to request in writing the revocation of their gaming privileges through our self-exclusion program including 1-, 3-, and 5-year exclusions. Our Mississippi and Florida properties have extended those options to include a lifetime self-exclusion option.

#### **To Prevent Underage Gambling and Unattended Minors in Casinos**

- We work diligently to prevent underage individuals from participating in any gaming at our facilities or loitering in the gaming area of a casino by holding to the most stringent standards for checking IDs before allowing access to our gaming floors.
- We communicate the legal age to gamble through bold and highly visible messaging at our properties.
- Employees working in relevant areas receive training in procedures for dealing with unattended children, underage gambling, and the purchase and consumption of alcohol and tobacco by minors.
- If a child appears to be unsupervised or in violation of local curfews and other laws, security or appropriate personnel take reasonable steps to locate the parent or responsible adult on property or by telephone.



## Exhibit X.A.6 – Historical Efforts Against Problem Gambling

---

*Submit as Exhibit X.A.6. a description of the processes proposed to address problem gambling at the other facilities it owns or controls, the effectiveness of those processes, and the metrics the Applicant will use to determine the effects.*

### **To Advertise Responsibly**

- Our advertising and marketing:
  - o Includes a very recognizable responsible gaming message and/or a toll-free helpline number wherever practical.
  - o Reflects contemporary standards of good taste.
  - o Strictly complies with all state and federal standards to make no false or misleading claims.
  
- Our gambling advertising and marketing does not:
  - o Contain images, symbols, celebrity/entertainer endorsements and/or language designed to appeal specifically to children and minors.
  - o Feature anyone who is or appears to be below the legal age to participate in gambling activity.
  - o Contain claims or representations that gambling activity will guarantee an individual's social, financial or personal success.
  - o Get placed before any audience where most of the audience is ordinarily expected to be below the legal age to participate in gambling activity.
  - o Imply or suggest any illegal activity of any kind.

### **The effectiveness of current processes to address problem gambling at our facilities**

We engage in processes to address problem gambling that are based on best practices as determined by regulation, various subject matter expert agencies, and the AGA Code of Conduct. Enterprise-wide all of our team members have been trained in problem gambling awareness, and we sincerely hope our responsible gaming signage and other responsible gaming measures have prevented many from crossing the line into gambling problematically and that our extensive marketing of the 1-877-8-HOPENY helpline (in New York) has been instrumental in prompting problem gamblers to reach out for help. However, it is difficult to measure the true impact of these efforts. We will participate in research initiatives endorsed by the New York State Gaming Commission to better understand the effectiveness of regulated processes to address problem gambling.

### **Metrics we will use to determine the effects of our proposed processes to address problem gambling at newly licensed facilities**

Assessing the impact of our efforts to address problem gambling at the societal level will be difficult to accomplish with precision. Through communication with problem gambling service providers, problem gambling prevention providers, and other key community informants, we will be able to gather some feedback on how well our problem gambling mitigation efforts are working in addressing community concerns.

The effectiveness of our efforts to promote the 1-877-8-HOPENY helpline can be partially measured by helpline-generated data that specifies the volume of calls for problem gambling help, the location of the caller, and information regarding where the caller obtained the helpline number.

## Exhibit X.A.6 – Historical Efforts Against Problem Gambling

---

*Submit as Exhibit X.A.6. a description of the processes proposed to address problem gambling at the other facilities it owns or controls, the effectiveness of those processes, and the metrics the Applicant will use to determine the effects.*

The effectiveness of our self-exclusion program can be partially measured by different metrics: number of patrons enrolling into our self-exclusion program each month or year; number of interventions provided to self-excluded individuals caught on the gaming floor; number of self-excluded individuals requesting and approved for removal on the self-exclusion list; number of repeat self-exclusions; and perhaps most importantly the number of calls to the 1-877-8-HOPENY helpline or local problem gambling treatment providers made by patrons during the process of enrolling in the self-exclusion program.

Countermeasures used to prevent the return of a self-excluded guest:

1. All excluded player accounts are flagged in the slot accounting system and, if that player's club card is inserted into a slot machine, a visual and audible alarm sounds in the Surveillance Monitoring Room alerting the staff of the presence of a self-excluded player.
2. Excluded guests are immediately removed from mailing lists and stripped of benefits (promotional offers point and comp value balances).
3. No jackpots will be paid to excluded guests.
4. Excluded guest names are added to a weekly exclusion report which is distributed to all appropriate departments for review and assistance in facial recognition.
5. Excluded guest photos are distributed to each Security and Surveillance shift to increase facial recognition.
6. Excluded guest photos are placed in the Security office on a digital frame that continuously flips to further enhance facial recognition.

The effectiveness of our problem gambling awareness training will be measured by asking training participants to complete training evaluation forms and by our supervisors monitoring the actions of their employees to determine if employees are responding to requests for assistance as trained. Additionally, employee surveys will be conducted annually to help inform our responsible gaming and problem gambling awareness efforts.

We will also collect data on number of marketing opt-out requests, the number of credit opt-out or limit requests, any occurrence of minors caught gambling on the casino floor, along with the time, date, number and types of other interventions made by security.

Additionally, we would be pleased to join any workgroup assembled by the New York State Gaming Commission to develop standardized data collection protocols and will strictly comply with all regulation promulgated by the New York State Gaming Commission that specifies how and what metrics casino operators will use to assess the effectiveness of problem gambling intervention efforts.

