

## Expanded Gaming Frequently Asked Questions (updated June 20, 2019)

<b>INTERACTIVE GAMING</b>		
<b>Applicable Statute or Regulation</b>	<b>Question</b>	<b>PGCB Response</b>
58 Pa.Code § 801.2 Definitions	<p>Definition of gaming employee includes that the board determines who needs to hold a gaming employee permit based on the work to be performed. This includes the Call Center and Fraud/Security/Payments teams.</p> <p>1) Will the PGCB provide prioritization/status updates for occupational licenses?                      2) What is expected turnaround time on occupational license approval?                      3) In the event the occupational license is not granted on targeted go-live what are the consequences?</p>	<p>1) Upon request, the information regarding occupational permits can be obtained by the entity.</p> <p>2) Gaming employee applications can be processed on average within 14-21 days following the receipt of fingerprint results. Applicants should be aware that it will take longer for the PGCB to receive the results if fingerprints are taken outside of Pennsylvania.</p> <p>3) In the event that an application has not yet been approved prior to the go-live date, the individual is not allowed to perform any work relating to iGaming in the Commonwealth.</p>
58 Pa.Code § 808.1(g)(1) General Provisions	<p>Is a licensed individual that is employed at a licensed facility that shares the same corporate parent of another licensed facility prohibited from iGaming on that other licensed facility's iGaming system?</p>	<p>An employee of a licensed entity is only prohibited from using the iGaming platform offered by their specific employer. An employee of the corporate parent, however, is prohibited from using an iGaming system offered by either casino</p> <p>For example: Employee works for Casino A. Corporate parent owns the slot machine licenses that operate Casino A and Casino B. Employee is prohibited from using any iGaming system offered by Casino A, but may use an iGaming system offered by Casino B. However, if Employee works for Corporate parent, he cannot use either iGaming system.</p>

58 Pa.Code § 809.3 Location of Equipment	With the new Department of Justice opinion regarding the Wire Act, is there any Board guidance as to where a customer service team can be based?	The Customer Service team may be located anywhere.
58 Pa.Code § 809.6(e)(2) System Requirements	How long must audit logs recording user activities, exceptions, and information security events be kept?	The timeframe initially has been set at two years, however, that time could change when the Regulations transfer from Temporary Regs to Proposed Regs.
58 Pa.Code § 809.6(g)(1) System Requirements	As our business requires a 24/7 online availability, how would the PGCB like this requirement for a “graceful shutdown” to be accomplished?	The accomplishment of the technical "how" of the process is up to the certificate holder and/or operator. However, any time that it is anticipated by the certificate holder and/or operator that a system shutdown or restart will be performed, or any sort of system maintenance will occur that may impact a player's ability to access the system or game on the system, the Board should be notified in advance, and players should likewise be notified. Player notification can be by pop-up, a post on the iGaming system's website, or an email to players.
58 Pa.Code § 809.6(g)(2) System Requirements	As our business requires a 24/7 online availability, how would situations regarding master resets occurring be handled?	See above. Additionally, if a shutdown or master reset occurs due to an emergency or technical difficulty that affects gaming, the Board should be promptly notified of the issue and the resolution.
58 Pa.Code § 809.7(c) Geolocation requirements	(1) Does the prohibition of a player wagering with an iGaming system while on the gaming floor of a licensed facility apply to all facilities, or only the licensed facility that the player is located?	(1) Interactive gaming is prohibited on the gaming floor of all licensed facilities, regardless of which gaming floor the player is on and what Interactive Gaming System the player is attempting to access. For example: A player at Parx Casino must be prevented from wagering on all iGaming systems in the Commonwealth.

	(2) Who will be responsible for maintaining the applicable list of properties? By the Geolocation service or will we need to do it?	(2) Compliance with this requirement is the sole responsibility of the certificate holder. Each certificate holder and/or operator is able to contract with a provider who can furnish the necessary Geolocation services. However, the ultimate responsibility still rests with the certificate holder.
58 Pa.Code § 810.11(c)(3) Prohibitions	(1) Once a game stays incomplete for 24 hours, we can either forfeit the player's bet or return it to them, so long as this is explained to them in our T&Cs or in our game rules. The only exception being where a system error has prevented completion of the game, in which case, we must refund the player's bet. Is this correct?  (2) What should we do with forfeited bets?	(1) This was changed to 30 days by the Board in an Administrative Change/Clarification that has been posted on the Board's website. Other than that small change, the description of the process is accurate.  (2) The exact process for this sort of transaction is still under deliberation by the Board. Further guidance will be provided when available.
58 Pa.Code § 810.11(a)(3) 58 Pa.Code § 810.11(d)	Are there any limits to Auto-Play or Auto-Spins in Interactive Gaming?	Any auto-play feature may only be permitted if approved by the Board. If auto-play is permitted, the operator may have an auto-play feature that is limited to 50 spins as the maximum auto-play amount. The auto-play must be able to be turned off by a player at any time during game play.
58 Pa.Code § 810.13(a) Test Accounts	Is it permissible to have Customer Service Teams and other members of the iGaming entity that are located outside of the Commonwealth to have an account that is unblocked from the Geolocation system to perform testing and recreate game-related customer service issues?	Yes, these test or audit accounts will be allowed to access the Interactive Gaming System despite not being located within the Commonwealth. The IP addresses and identifying information (username, etc.) for these accounts that will be granted a byapss of the Geolocation requirement should be disclosed to the Bureau of Gaming Operations and the Gaming Lab prior to any attempt to access of the iGaming System.

58 Pa.Code § 811.4 Responsible Gaming	Is there a Pennsylvania Responsible Gaming logo that is available for entities to put on their platform that link to the Pennsylvania Gaming Control Board’s website as required?	This logo is available. Please email Liz Lanza, the Director of the Office of Compulsive & Problem Gambling, and she can provide the logo. <a href="mailto:elanza@pa.gov">elanza@pa.gov</a>
58 Pa.Code § 811.6(e) Notification	What will the process be for notifying the Bureau with issues regarding cheating/theft/embezzlement, gaming by a self-excluded individual, or other prohibited gaming?	The exact process is still being developed by the Board. As it pertains to individuals who violate self-exclusion, it is up to the certificate holder to report the violation via the Self-Exclusion database. The Board will provide further specific guidance regarding cheating or other related activities or gaming by non-self-excluded individuals. This will require a report by the iGaming manager to the Bureau of Investigations and Enforcement.
58 Pa.Code § 811.7(c) Mandatory iGaming Logging	Are we to generate a report for Account Creation? Or just log the info and share it as and when requested? How will this database information be shared with the board? Is there a desired frequency of sharing this information or should it be on need basis?	No report needed, however, this information should be logged and available upon request.
58 Pa.Code § 811.9(i) Required Reports	What is the process of voiding completed transactions?	The first step is to report the requested void to the Bureau of Gaming Operations with as much detail surrounding the circumstance as possible. The matter will then be reported to the Executive Director who will decide whether to grant Board approval.
58 Pa.Code § 811.9(f) Required Reports	Does “Pending wager account” report mean a report of all the accounts with unfinished games?  Does it involve bonus or promotion money that is pending or has expired?	Yes, pending wager account means all accounts with unfinished games or amounts wagered that have not had activity for one year.  In regards to promotion or bonus money, no report of that amount is needed since it is

		promotional in nature and does not reflect actual money wagered or earned at that time.
58 Pa.Code § 811.9(1) Required Reports	Would the Board like a copy of the report generated that identifies potential compulsive and problem gamers, including those who self-report?	No report need be filed, but it should be available on an "as requested" basis.
58 Pa.Code § 812.3(a)(3), (5) Account Security	Does the use of strong authentication satisfy part (5) where the user will receive an e-mail verification, or should electronic notification be an independent feature that could be enabled as an alternative to strong authentication?	The two requirements are independent of one another. So, offering option (3) (strong authentication) will NOT satisfy the requirements of option (5). A player must be free to choose one, both, or none of those options.
58 Pa.Code § 812.3(a)(6); 58 Pa.Code § 812.9(c)(1) Session Inactivity	Would simply logging out a player after 15 minutes satisfy both regulation sections?	Yes, this will satisfy both regulation sections.
58 Pa.Code § 812.3(e) Account Security	Will the PGCB provide prioritization / status updates for the 3rd party license applications (PSP's, KYC, Etc.); If not how will approval of providers be communicated? It is our understanding these providers cannot be used in solutions if not licensed.	3rd party provider application information will be disclosed on the PGCB website for certificate holders and providers. For any entity to be involved in ANY process of iGaming, the entity must be licensed.
58 Pa.Code § 812.4(c)(2) Single Session	Should a user be prevented from logging in on multiple devices at the same time, or prevented from multiple gameplays at the same time? Would a player be automatically logged out of one device when they use another device to initiate play?	There are no restrictions imposed on certificate holders or operators to log individuals out of the iGaming system if a player is logged in on multiple devices. The only requirement is that the system prevent a player from occupying multiple spots at the same interactive gaming table.
58 Pa.Code § 812.9(d) Player Account Controls	Should the "session finished" message to the interactive gaming device be sent only when the session is terminated owing to session limit or also owing to inactivity timeout?	The two roman numeral subsections (i) and (ii) apply to both subsections (2) and (3). As it is, technically, when the iGaming system terminates a session when the inactivity limit is reached, the "session finished message" should be sent in any

		instance when it is the system itself that terminates the session (i.e, session limit, inactivity timeout, system issue, etc.).
58 Pa.Code § 812.9(g)(1) Player Account Controls	For increases to self-limitations imposed by a player, will it suffice if the player is mandated to contact customer support (via chat, phone, or email) after the time has elapsed, or must this be done on the platform?	The decision as to the process to allow a patron to INCREASE the self-limitations is up to the operator and can be platform-based or customer service-based, so long as the limit increase does not take effect until the previous self-imposed limit has elapsed.
58 Pa.Code § 812.9(g)(4) Player Account Controls	At the time of registration, can the new account be configured to have a default daily session limit of 24 hours? Or should it be set to some other value?	There is no requirement that a default daily session limit be imposed. It is up to the provider to determine if a default daily session limit should be implemented in the iGaming system. The only requirement is that a player cannot set a daily session limit that exceeds whatever limit is set by the provider.
58 Pa.Code § 812.13 Dormant Accounts	Should we contact any/all players when their account becomes dormant, even those with no funds or less than \$1 in their account?	Yes, the rules applied to any account regardless of the funds in the account at the time it reached dormant account status.
58 Pa.Code § 813.5(c) Promotion Account Summary Report	This regulation mentions that this report should be run on-demand. Can you confirm that this report will not need to be a part of any daily/weekly/monthly data feed?	This interpretation is correct; however, the Bureau of Gaming Operations will review proposed reports and communicate with certificate holders and operators on whether alternate report information will be acceptable.
58 Pa.Code § 814.1(f) General Requirements	Does this mean that when an operator locates someone participating in gaming that should be excluded, they will notify certificate holder and the expectation is that the certificate holder's Key Employee will notify board?	It is the certificate holder's responsibility to have a key employee who will make these reports to the Board. The operator is not required to have such an individual.
58 Pa.Code § 814.2 Responsible Gaming Limits	(1) Does subsection (c) refer to a maximum amount of wager set by a provider in a particular game?	(1) This section applies to player-imposed limits. So yes, providers may choose to set a maximum wager limit at a particular game or table. However, players must also be able to establish a

	<p>(2) Is the temporary suspension in (e) a minimum of 72 hours? The regulations on terms and conditions say for a period of no less than 72 hours (§ 811.3(b)(3)(v)(10))</p>	<p>maximum amount that can be placed on a single wager for their accounts. For example: Certificate holder offers an interactive Blackjack table with a \$1,000 maximum bet. John Doe sits at the table and he has established for himself a \$50 maximum wager limit. Despite the table allowing a \$1,000 maximum wager, the iGaming system has to honor John Doe's \$50 max wager limit.</p> <p>(2) The T&amp;C Regs will control, and the Board would request that any temporary suspension be at least for 72 hours. This may be updated in future regulations.</p>
<p>58 Pa.Code § 814.2 Responsible Gaming Limits</p>	<p>How is the Board handling subsection (2) regarding “loss limit?” Is it true that the Board instead is requiring a “spend limit”? How would that work?</p>	<p>The limit stated in subsection (2) of this section was originally termed a “loss limit.” However, the new intention is that this limit is deemed to be a “spend limit.”</p> <p>For example: A player sets a daily “spend limit” in his iGaming account of \$100. The player plays 4 hands of Blackjack at \$25 per hand, winning each hand, resulting in \$100 of winnings. The player would be prohibited from continuing to game for the rest of the day, as the player has reached his daily spend limit amount of \$100.</p>
<p>58 Pa.Code § 815.4 iGaming Self-Exclusion</p>	<p>How does the Board envision the self-exclusion process will work? Who will be provided the self-exclusion list?</p>	<p>The exact process is still being developed by the Board. However, the Internet Self-Exclusion List (as it grows) and the Board's Self-Exclusion List will be made available to the iGaming certificate holders to pull from the Self-Exclusion database and implement accordingly. It is the licensee's responsibility to work with the operators to</p>

		ensure that no Self-Excluded individual uses the iGaming system. It also remains the licensee's responsibility to report iGaming Self-Exclusion violations through the Self-Exclusion database.
58 Pa.Code § 815.4 iGaming Self-Exclusion	If a player self-excludes in another jurisdiction from iGaming and then opens an Interactive Gaming Account with the certificate holder or operator's Pennsylvania iGaming system, are the certificate holder or operator expected to treat those players as self-excluded in Pennsylvania?	A Pennsylvania iGaming certificate holder or operator is NOT required to prohibit an individual who is self-excluded in another jurisdiction from using their iGaming system. However, certificate holders and operators have the discretion to put such persons on their exclusion list as they see fit.
§ 809b.7 Geolocation Technical Standards	How will the Board handle the process of a Geolocation service provider implementing back-office updates to protect the system against new risks and vulnerabilities?	These updates will require approval by the Board prior to implementation as well as notification. The process for these updates will be the same approval process as for initial software and system approvals.
§ 809b.7 Geolocation Technical Standards	How will the Board handle the process of Geolocation service providers putting out Software Development Kits (SDKs) to the clients and platforms?	These updates will require approval by the Board prior to implementation as well as notification. The process for these updates will be the same approval process as for initial software and system approvals.
§ 809b.7 Geolocation Technical Standards	How will the Board handle whitelisting of specific IP addresses, user accounts, or devices from the platform providers to help facilitate ongoing testing in the live environment? Such an action would allow test access and bypass live geolocation checks. Will this require PCGB approval and if so, what will the process be? Note that this function is only for testing and would never be used for the live environment.	These test accounts and the procedures outlined above are acceptable. The Geolocation services provider will be required to disclose to the Board all IP addresses, user accounts, or devices that will be accessing the platform or interactive gaming system for test purposes, identifying those that will be whitelisted to work around the geolocation protections.



## SPORTS WAGERING

Applicable Statute or Regulation	Question	PGCB Response
58 Pa.Code § 1406.1	Is a licensed individual that is employed at a licensed facility that shares the same corporate parent of another licensed facility prohibited from Sports Wagering at that other licensed facility's Sports book?	<p>An employee of a licensed entity is only prohibited from using the Sports Book offered by their specific employer. An employee of the corporate parent, however, is prohibited from using a Sports Book offered by either casino</p> <p>For example: Employee works for Casino A. Corporate parent owns the slot machine licenses that operate Casino A and Casino B. Employee is prohibited from using the Sports Book offered by Casino A, but may use the Sports Book offered by Casino B. However, if Employee works for Corporate parent, he cannot use either Sports Book.</p>
	May a sports wagering certificate holder or operator accept debit cards as a form of payment for making a wager at a retail sports book?	This is an acceptable practice, so long as the transaction involves an in person transaction with an employee of the sports wagering certificate holder, and the patron is not permitted to use the card as a credit card.
58 Pa. Code § 1410.1(a)	This section indicates that the sports wagering certificate holder has to comply with the Compulsive and Problem gaming requirements set forth for interactive gaming, including self-	The time limit as contemplated in the regulations for interactive gaming would not be applicable to an individual who is engaged in mobile or interactive sports wagering.

	imposed limits. Does this include the “time limit”?	
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<b>Video Gaming Terminals</b>		
58 Pa. Code § 1103.1(b)(4)(iii)	Must each establishment have its own surveillance system located at the establishment, or can there be one, centralized server at a secondary location?	A centralized server for surveillance footage storage and review is permissible, so long as each establishment has the necessary equipment to allow the footage to be viewed in person at the establishment, and the Board has been provided remote access to the surveillance system.
Miscellaneous	Where can VGTs be located?	<p>VGTs can only be located in “Truck Stop Establishments” that meet the following criteria:</p> <ol style="list-style-type: none"> <li>1. Is equipped with diesel islands used or fueling commercial motor vehicles;</li> <li>2. Has sold on average 50,000 gallons of diesel or biodiesel fuel each month for the previous 12 months or is projected to sell an average of 50,000 gallons of diesel or biodiesel fuel each month for the next 12 months;</li> <li>3. Has at least 20 parking spaces dedicated for commercial motor vehicles;</li> <li>4. Has a convenience store;</li> <li>5. Is a PA Lottery Sales Agent; and</li> <li>6. Is situated on a parcel of land of not less than 3 acres.</li> </ol> <p>Because VGTs may only be located at qualified “Truck Stop Establishments, VGTs are a use that is secondary and incidental to the primary use of</p>

		<p>the subject property as a “Truck Stop Establishment,” as determined by the Board.</p> <p>A county that currently hosts a casino may opt out of the placement of VGTs at a Truck Stop Establishment by passing a local resolution.</p>
Miscellaneous	<p>Must an establishment applying to the Board to offer VGTs qualify as a “truck stop” or “convenience store” under local zoning ordinances in order to be a “Truck Stop Establishment” under the Act?</p>	<p>No. An applicant for an establishment license must demonstrate to the Board that it simply meets the eligibility criteria found in the definition of “Truck Stop Establishment” in the Act. Part of that determination by the Board is whether the establishment <i>has</i> a convenience store, not whether it is classified as a convenience store under local zone ordinances.</p> <p>The Board recognizes that municipalities regulate zoning, and as part of zoning ordinances, may establish their own definitions and uses for truck stops and convenience stores. The specific zoning designation of an establishment, however, is independent from the Board’s determination, and is not dispositive of whether a location meets the criteria of a “Truck Stop Establishment” under the Act as interpreted and implemented by the Board.</p>
Miscellaneous	<p>What is a convenience store for purposes of allowing VGTs?</p>	<p>Convenience store: “retail establishment which sells a limited selection of packaged foods, drug store items, food for consumption on or off the premises, and basic supplies for the home and table, which may include the retail sale of liquid fuels.” For an establishment to qualify to offer VGTs, the Board must determine whether there is a convenience store on premises in addition to the</p>

		other criteria in the Act. The Board has the exclusive authority and jurisdiction in making the determination as to whether the establishment has a convenience store.
3-in-1 machines	Can a VGT establishment offers 3-in-1 ATM machines in the VGT gaming area?	A truck stop establishment who offers VGT gaming may utilize in the VGT gaming area a 3-in-1 machine that offers bill-breaking services, redemption services, and ATM services. The ATM services must be set to only allow transactions using a patron's debit card.