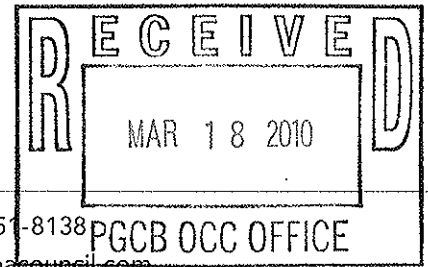




Council on
Compulsive Gambling
of Pennsylvania



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Richard Sandusky
Director of Requirement Review
PGCB
PO Box 69060
Harrisburg, Pa. 17106-9060

March 15, 2010

Dear Mr. Sandusky:

I would like to offer comments on one section of the Table Games Training Requirements listed under 527.3. To the point, there aren't any and there should be.

As you may know the Council on Compulsive Gambling of Pennsylvania has been working in the state since 1985 to help those people adversely affected by problem gambling. We have worked as partners with the Health Department, the Casinos, the Lottery, the Race Tracks, schools, universities and community groups encouraging and advocating not just for care for problem gamblers but for sound social policy as well.

We are in a unique position to collect information and data from our Helpline calls (we operate the Pa. Problem Gambling Helpline with support from our gaming partners and the Health Department, Bureau of Alcohol and Drug Programs, and those individuals and families struggling with gambling problems as well as from the employees and administrators of each casino in Pennsylvania. As a result of this unique position I can clearly and confidently state that a formal training program should indeed be required for the table games license holders on the issue of problem gambling and it should be a real program.

I am sure with the remarkable detail your office has had to put into the table games regulations it may seem a small point to address problem gambling. It may also be tempting to list a training requirement and move onto to more pressing concerns. But to simply require the license holders get "training in recognizing problem and compulsive gamblers and have procedures for informing their supervisors" I assure you will be woefully inadequate and could be the equal for having no such requirement at all.

Ostensibly such “training” could be the distribution of a pamphlet, a paragraph in an orientation or word of mouth information from a supervisor. We must know what these folks are going to be told. Who will do the training and should it not be a group or person with the special expertise in this area to make the training an effective, detailed, informative, accurate and helpful process for all concerned including the future customers.

Please avoid the oversight of seeing this training as simple and do not treat it as inconsequential. The PGCB has an excellent and well earned local and national reputation for a thoughtful, focused, coordinated and comprehensive approach to problem and compulsive gambling and I am somewhat amazed and dismayed at the lack of definitions, scope, content, evaluation etc. for table game employees compared to the slot employees. There is no reason for these training requirements not to be exactly the same. The content should be current, accurate and a reflection of not just “recognizing and informing supervisors” but knowing how self-exclusion works, how to assist the distressed customer, or the troubled co-worker.

There are many elements we think essential in such training for responsible gaming to remain a priority in Pennsylvania. I have seen as we began to open casino’s in Pa. how the interpretation of staff training on problem gambling differed remarkably from one company to another. Some did a great deal, some did almost nothing, some shared inaccurate or erroneous information, many offered no specific resources etc.

The saving grace was the leadership and coordination from the PGCB and the Office on Problem and Compulsive Gambling. Here there was a central source of accurate information and most importantly the establishment of a responsible standard for training requirements that would meet the goals we shared for employees, customers, the license holders and the citizens in the state who looked to the PGCB to be sure gaming remained fair, regulated and mindful of the needs of problem gamblers and their families with responsible gaming programs- not a responsible gaming sentence.

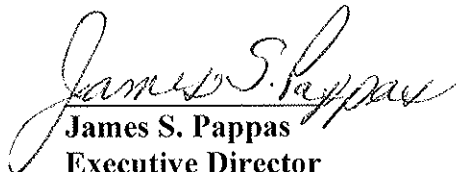
I am most disappointed that this noteworthy accomplishment is being abandoned at the time when employees will be working in more intensive, high energy games with many customers coming and going and playing far more sophisticated games than slot machines. The needs are even more real for this group of gamblers and they need the same supports, information and programs as the slot customers. All these

gamblers will be in the same building, among the same employees and all these employees should have the same training programs in place to assure that anyone in need would have the best to offer that person in need.

I am hoping the response to this letter will in fact be a clarification that the original requirements put in place, after due thought and deliberation, will be continued with this next more intensive expansion of legalized gambling in Pennsylvania. The current training programs are inclusive of all the details and information table game employees need to know to offer the services, information and referrals we think critical to real responsible gaming programs.

I look forward to hearing from your office about these concerns and we are very eager to offer any information or assistance possible to address this need in a safe and responsible fashion.

Sincerely,


James S. Pappas
Executive Director
CCGPA

CC: Greg Fajt, Chairman, PGCB
Kevin O'Toole, Executive Director, PGCB
Nannette Horner, Director OCPG for the PGCB