



Responsible Gambling

Verification
Best Practices



NCPG
National Council on Problem Gambling





Responsible Gambling Verification Best Practices



NASPL

The recognition of problem gambling issues within our industry over the course of the past decade has been nothing short of remarkable. Whereas at one point it was considered a taboo subject that shouldn't be openly addressed, we have evolved now to launch what I consider a crowning achievement of NASPL.

This new standard and verification program – the third such initiative launched by our organization – works on two different levels. For lotteries which are hoping to establish a responsible gambling program but haven't felt like they had the expertise to do so, the opening level of our verification program allows them access to national experts in the field. These experts will critique their program, offering advice on how best to educate both their employees and the public about the disorder and available treatment options. For lotteries who already have a responsible gambling program, this initiative will engage these same experts on how existing plans could be stronger and give recognition to those who have created solid programming.

Another evolutionary aspect of this I'm particularly proud of is the work with our partner in this initiative, the National Council on Problem Gambling. In times past, some would have considered them the enemy – and vice-versa. For us to be able to work with the Council, and in turn their network of some of the most influential problem gambling experts on the planet, shows to me how far we've progressed.

I'm excited NASPL and the NCPG have come together to make this program a reality, and we look forward to providing this service to our members.

A handwritten signature in black ink, appearing to read "David Gale".

David Gale
Executive Director
NASPL



NCPG

National Council on Problem Gambling

We are incredibly proud of the RGV program and the partnership we have with NASPL. For the first time a segment of the U.S. gambling industry has adopted a responsible gaming framework and independent verification process. This framework and standard was developed in conjunction with the National Council on Problem Gambling. NCPG's vision is to improve health and wellness in America by reducing the personal, social and economic costs of problem gambling. We do this by leading state and national stakeholders in the development of comprehensive policy and programs for all those affected by problem gambling.

We congratulate NASPL members for their recognition of problem gambling and embrace of responsible gaming. NCPG is pleased to work with NASPL in the development, administration and verification of these standards. We bring more than 40 years of independence and experience to the table. We acknowledge and celebrate NASPL members and staff who have taken a leadership role in responsible gaming, while we continue to advocate for additional programs and services to assist problem gamblers and their families. While the disease of problem gambling can never be eliminated, together we can help minimize the social costs of gambling addiction.

A handwritten signature in black ink, appearing to read "K. Whyte".

Keith Whyte
Executive Director
NCPG



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VERIFICATION LEVELS:

Planning Level

At the planning level, an organization will have a comprehensive plan in place to begin a responsible gambling program. This plan should include the following elements:

- An overall responsible gambling plan
- Employee training
- Retailer training
- Public education and awareness
- Product oversight
- Research
- Advertising
- Resources

Each of these elements will be discussed in greater detail later in this document.

A successful application at this level will address each of these elements as part of a comprehensive whole rather than as a collection of disparate programs with no guiding principles or coordination. Ideally, the plan will resemble an organization's strategic plan in that it will include a statement of the organization's responsible gambling mission, core values, and guiding principles. It will also include the specific action items that the organization plans to undertake to achieve their mission.

Implementation Level

At the implementation level, an organization will meet the standards required at the planning level. In addition, they will have implemented the action items included in their responsible gambling plan and have a process in place for evaluation and improvement. A successful application will be able to demonstrate with specific examples that the action items have been implemented and that they are sufficient to meet the goals outlined in the responsible gambling plan.

Sustaining Level

At the sustaining level, a lottery must be able to demonstrate that they have operated at the implementation level for at least three years. The lottery should also have conducted an internal assessment of their responsible gambling plan and be prepared to discuss which elements have worked well and which are in need of improvement, and then to list the steps that will be taken to improve the program in light of their experience.



VERIFICATION PROGRAM OVERVIEW AND PROCESS

AREAS OF ASSESSMENT:

Applicants will be assessed on their demonstrated competence in the following areas:

- o Overall planning
- o Employee training
- o Retailer training
- o Public education and awareness
- o Product oversight
- o Research
- o Advertising
- o Resources

LOTTERIES ELIGIBLE TO BE ASSESSED:

As this program is a joint effort between NASPL and the US-based NCPG, only lotteries in the United States are able to apply. NASPL will explore the possibility of partnering with a Canadian-based NGO to provide a verification program in that country.

INDEPENDENT ASSESSMENT PANEL:

All applications will be assessed by a four-member panel under the guidance of the NCPG. One assessor will be appointed by NASPL, with emphasis given to members of the NASPL responsible gambling subcommittee. Three assessors will be appointed by the NCPG. All assessors must have a history of expertise in responsible gambling and are subject to approval by NASPL and the NCPG. Once a list is approved, the NCPG will assign assessors to individual applications. This assignment will be random, except that an assessor may be reassigned in the event of a conflict of interest (such as a previous employment, vendor, or consulting relationship with the lottery in question). Assessors will not be identified in the final report.



MENTOR:

Lotteries considering applying for verification are encouraged to ask the NASPL Responsible Gambling Subcommittee to assign a mentor, particularly at the planning level. Mentors will be employees of lotteries that have already achieved verification, will have demonstrated individual competence in responsible gambling, and will have received training in the verification process similar to that given assessors. Mentors will be available to help lotteries during the planning process and to review plans and action items prior to submission. In addition, mentors may help lotteries that do not achieve verification standards to improve their programs. Mentors will not play any role in the assessment of a lottery that they work with in this capacity, and comments by a mentor should not be construed as a guarantee of approval by the assessment panel.

CRITERIA:

Each aspect of the submission will be reviewed by the assessors to determine if the plan and accompanying action items in their opinion adequately demonstrate proficiency in that area. Each area will be rated on the following scale:

- 4: Exceeds standards required for verification
- 3: Meets standards required for verification
- 2: Some improvement is required to meet standards
- 1: Considerable improvement is required to meet standards

A lottery will be considered to be proficient in an area when three of the four assessors have assigned a score of 3 or higher to that area. To achieve the verification standard, a lottery must be proficient on six of the eight plan elements.

In addition to assigning numeric scores, the assessors will be encouraged to submit comments explaining their scores. Such comments will be required in the event of a score of 1 or 2.

PROCESS:

Assessors will first review the proficiency of the lottery's responsible gambling plan in each area and determine if the lottery is eligible for verification at the planning level. For those lotteries applying at the implementation or sustaining levels, assessors will then evaluate the proficiency of the actions taken to implement the responsible gambling plan. If, in the view of the assessors, a lottery applying at the implementation level has an adequate plan but has not sufficiently demonstrated their efforts at putting the plan into action, the lottery can instead be verified at the planning level.

Before submitting scores, assessors will have the opportunity to address clarifying questions of the lottery. Assessors will submit their questions to a designated contact at NASPL, who will consolidate the questions into one document and forward them to the lottery. The lottery will have one week from the receipt of the questions to submit a written response.



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Following the receipt of answers to any submitted questions, assessors will send their scores and comments to the NCPG. At this point, the NCPG will share each assessor's scores and comments with the other three assessors who will then have the opportunity to revise their scoring. After receiving any revisions, the NCPG will determine if the overall scores meet the criteria for verification. Notification of the assessors' decision, along with a report summarizing scores and comments, will be sent to the lottery by the NCPG.

Should a lottery not meet the criteria for verification at the planning level, they will be given the opportunity to revise or clarify their plan accordingly. Revised plans received within two weeks of notification, will be resubmitted to the original assessors who will have the opportunity to revise their scores.

Any lottery that wishes to appeal the assessors' final decision or to seek clarification to any comments will have ten business days from the receipt of the decision to submit documentation or questions. In turn, assessors will have ten business days to answer submitted questions or review any appeals and issue their findings. If a lottery has their application denied, they may appeal to a panel of three members mutually acceptable to NASPL and the NCPG who were not involved in the original assessment. Lotteries should inform NASPL of their decision to appeal within one week of being notified of the denial of the application and will have an additional week to prepare material in support of the appeal. Appellants must demonstrate that the assessors were in error in their scoring or comments. Revisions to a responsible gambling plan or other substantive changes to an application will not be considered by the appeals panel. The decision of the appeals panel is final. Should an appeal be denied, the appeals panel will prepare a brief explanation of the denial.

NCPG STATE AFFILIATES:

NASPL members are encouraged to work with their state affiliate NCPG chapter where applicable in the process and/or with state health or human services agencies with responsibility for problem gambling programs. If no viable state resources exist, the lottery should contact NCPG who will engage another state affiliate from that region.

TIMEFRAME:

Deadlines for submissions will be announced by NASPL at least three months in advance. The assessment panel will have eight weeks from the time the submission period closes to complete their initial assessment, and lotteries will be notified of a final decision within two months of completion of the assessment process.



LENGTH OF VERIFICATION:

Verification at the planning level will be valid for a two-year period. During that time the lottery is highly encouraged to implement actions in support of the plan and thereby move towards the implementation standard. Lotteries achieving planning verification may apply for implementation status before expiration of their planning verification should they deem themselves ready. Implementation and Sustaining standards will be valid for a three-year period.

FEES:

Fees for the program will be borne by NASPL, with no charge passed along to member lotteries who participate.

SUBMISSIONS:

Submissions and supporting documents will be uploaded to the NASPL Matrix website.

MANAGEMENT ENDORSEMENT/SINGLE POINT OF CONTACT:

All submissions must include a signed endorsement letter from the lottery's director or chair of a lottery board or commission. Submissions must also provide the name and contact information (including mailing address, phone number, and e-mail address) of one person who will be the primary point of contact.

CONFIDENTIALITY:

Submissions that meet the criteria for verification will be published on the NASPL website. Any submissions deemed not to meet verification criteria will be released by NASPL only with the permission of the lottery. NCPG will not release any material without the permission of NASPL and the lottery.



NASPL RESPONSIBLE GAMBLING FRAMEWORK

1. PLANNING

Why is this important?

An effective responsible gambling program is more than a collection of activities. It is a coordinated and comprehensive effort that imbues responsible gambling into all aspects of a lottery's operations. It requires dedication and commitment from senior lottery management, including, especially, the chief executive. It is guided by a set of principles and core values.

Objectives:

- Lottery employees, retailers, vendors, public officials, and the public should clearly understand what the lottery's commitment to responsible gambling is and what steps the lottery is taking to fulfill this commitment.

At a minimum:

- The plan should include a statement of core values and principles.
- The plan should include the specific actions the lottery will undertake in support of these values and principles.
- The plan should be readily accessible to all interested parties.
- The plan should be regularly reviewed and revised.

2. EMPLOYEE TRAINING

Why is this important?

It doesn't happen often, but lottery staff can and do come into contact with people in distress because of their gambling or someone concerned about a family member, friend, employee or customer. And as lotteries increasingly move into Internet-based sales or other programs, the frequency of these contacts may well increase. While those who deal frequently with the public are the most likely to have this sort of contact, it



can happen to any lottery employee. While we do not expect lottery staff to become counselors or to make diagnoses, it is imperative that they know how to refer someone to the appropriate resources. In addition, any employee can be asked questions about problem gambling in a social setting, and a trained employee can provide accurate information and portray a responsible lottery in a positive light.

Objectives:

- Staff should understand lottery policies and programs regarding responsible gambling and problem gambling.
- Staff should have a basic understanding of what problem gambling is, and be aware of the signs that someone might be developing a problem.
- Staff should know about available services, and how to refer someone to these services.
- Staff with frequent public contact should be trained in how to cope with someone in a crisis situation. They should also know some strategies for dealing with a customer showing signs of gambling-related distress.

At a minimum:

- The lottery will have a formal training program that is required of all employees. This program should be designed in consultation with individuals with expertise and experience in responsible gambling.
- All employees will be exposed to responsible gambling training on at least an annual basis.
- Employees should be given copies of the lottery's responsible gambling policy and plan.

In addition:

- The lottery should make use of NASPL's training videos.
- The lottery should ensure training of new employees when hired.
- The lottery should work with state councils (if available) and/or other local resources to provide this training.
- Additional training opportunities, such as attendance at conferences, should be provided to lottery staff with specific responsibility for responsible gambling.
- Material related to responsible gambling should be prominently displayed at lottery offices.

3. RETAILER TRAINING

Why is this important?

Retailers have the most frequent contact with lottery players and are the most likely to recognize excessive or problematic play, especially in a regular customer. As with lottery employees, we don't expect retailer employees to become counselors or to make diagnoses, but a retail employee who can provide basic assistance to a customer experiencing difficulties can make a real difference in that person's life and present the store in a positive light.



Objectives:

- Retail staff should recognize signs of a gambling problem and know what to say to someone expressing distress.
- Retail staff should know how to provide information on basic services, most notably state or national helplines.
- Retail staff should understand the importance of not selling lottery products to those under the legal age.

At a minimum:

- Information on problem gambling resources, particularly helplines, should be made available to every employee involved with lottery-related sales or customer service.
- Within legal limitations, retailers should be required to post information about problem gambling services in locations that will be seen by lottery customers.
- Information on responsible gambling should be provided to all new retail outlets as part of their basic lottery training.
- Retailers should be periodically reminded of the importance of posting information related to responsible gambling and treatment referral.
- Age verification should be frequently stressed to store management and those directly selling lottery products.

In addition:

- NASPL training videos should be used when appropriate.
- Lotteries should consider preparing and distributing material to be posted in employee break rooms.
- Lotteries should make use of lottery terminals to periodically send responsible gambling reminders to retail staff.
- Lotteries may make use of retailer advisory councils, retailer conferences, and retail trade associations to provide training and to receive feedback on retailer training and public education efforts.

4. PUBLIC EDUCATION AND AWARENESS

Why is this important?

In most, if not all states, the lottery is the most widely popular form of gambling. In addition, through its extensive retail network, it is likely the form of gambling that has the most contact with players and non-players alike. The lottery therefore has a unique opportunity to improve awareness of problem gambling and help those in distress to locate appropriate resources. As a government agency, the lottery has a particular responsibility to ensure that customers are provided with adequate and accurate information to make an informed decision about whether to play and how much.



Objectives:

- Provide players with accurate and complete information about game design, including the chances of winning and method of payment (annuity vs cash).
- Provide players with information on available problem gambling resources.
- Provide players with information on how to play responsibly.
- Clearly communicate age restrictions.
- Develop partnerships with state problem gambling councils, departments of health or human services, treatment providers, and others working to reduce the harm that results from problem gambling.

At a minimum:

- A lottery will include prominent information on problem gambling helplines in multiple ways, including web sites, social media, point-of-sale, newsletters and more.
- A lottery will prominently remind customers of age restrictions.
- A lottery will make readily available complete information on game odds and prize payouts.
- A lottery will have a working relationship with other organizations providing services for those with gambling problems, recognizing that such organizations do not exist in every state.

In addition:

- Lottery communications should from time to time include responsible gambling tips.
- Lottery websites should include links to problem gambling service providers.
- Lotteries should be active members of national and (where available) state problem gambling councils.
- A lottery will participate in coordinated awareness activities, including National Problem Gambling Awareness Month and the Holiday Lottery Campaign.

5. PRODUCT OVERSIGHT

Why is this important?

Lottery games can contain features that encourage responsible gambling or, to the contrary, encourage irresponsible play. All of the messaging outlined above can be undone if the games themselves mislead or encourage underage play.

At a minimum:

- All tickets and play slips should include information about problem gambling resources, including helplines and websites.
- All lottery games should be reviewed to ensure that they do not contain images or themes that disproportionately appeal to those under the legal age for purchase.
- All games should be reviewed to ensure that tickets and related material do not contain misleading material about prizes and chances of winning or encourage irresponsible play.



In addition:

- Lotteries should consult with experts in the problem gambling field when making major additions, such as keno or internet games, to their product line.
- Lotteries should be aware of research into the risk factors or protective factors associated with each game type offered.
- Lotteries should consider using a risk assessment tool to help evaluate each type of game offered.

6. RESEARCH AND EVALUATION

Why is this important?

Research is an important but often overlooked component of a responsible gambling program. In particular, it is critical that responsible gambling programs be periodically evaluated and revised. Lotteries can participate in responsible gambling research in multiple ways. First, they can obtain feedback on their responsible gambling efforts from employees, retailers, players, and the general public. Second, they can make themselves aware of the research being done in academic and government institutions, particularly that related to risk and protective factors for those forms of games they offer or are considering offering. Third, they can conduct more formal evaluation of responsible gambling efforts using methods such as public opinion surveys or focus groups. Fourth, they can cooperate with those conducting research relevant to responsible gambling efforts. We recognize that not every state will have the resources to participate in all of these activities, but believe that some form of program evaluation is necessary for a responsible gambling effort to be successful.

Objectives:

- Implement a process for continuous improvement of responsible gambling efforts.
- Educate decision makers on state-of-the-art information on effective product design and responsible gambling communication.
- Assist those conducting research relating to responsible and problem gambling.

At a minimum:

- Lotteries will have a program in place to evaluate their responsible gambling efforts, though the formality of this program will vary with the size of the lottery.
- Lotteries will have a policy of cooperation with qualified academic researchers conducting relevant research on problem and responsible gambling.
- Lotteries will have a means of learning about advances in knowledge relating to responsible gambling.
- Lotteries should freely make available to other lotteries any research relevant to responsible gambling.
- Lotteries should regularly reach out to treatment providers, helplines, and problem gambling councils to learn of trends and issues concerning lottery products.



In addition:

- Lotteries can conduct their own research into responsible gambling, potentially using existing research efforts to learn about public awareness and misconceptions.
- Lotteries can conduct formal surveys of employees and retailers pertaining to responsible gambling knowledge and awareness.

7. ADVERTISING

Why is this important?

Advertising is one the most visible, and in many cases the most visible activity a lottery does, and as such, it is also the most scrutinized. Care needs to be taken that advertising reinforces a responsible gambling message and does not conflict with other lottery responsible gambling efforts.

At a minimum:

- Lotteries should have formal policies relating to advertising content in place, including but not limited to external mandates. The NASPL advertising guidelines should be used when they do not conflict with state law or regulatory requirements.
- The lottery should ensure that their advertising agency is aware of lottery policies and legal mandates.
- Lotteries should have a process for reviewing advertising before it appears to ensure compliance with mandates and responsible gambling efforts.

In addition:

- Lotteries may wish to have selected advertising reviewed by outside experts in problem and responsible gambling.
- Advertising can include or be devoted to responsible play messaging, including helpline numbers and responsible gambling tips.

8. RESOURCES

Why is this important?

A responsible gambling effort cannot be successful if a lottery does not devote sufficient resources to it. We recognize that lotteries may have legislative or other restrictions on the amount of resources (particularly financial resources) that may be devoted to responsible gambling efforts. However, a successful applicant must be able to demonstrate that it can devote sufficient resources to achieve all aspects of its responsible gambling plan.



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At a minimum:

- A lottery should have a person designated as having the lead responsibility for responsible gambling programs. This person should either be a part of senior management or a senior supervisor or professional with ready access to senior management.
- A lottery should be able to devote sufficient staff resources to accomplish its responsible gambling goals. These responsibilities should be spread throughout the organization.
- When legally permissible, lotteries should dedicate a portion of their budget to responsible gambling efforts. We recognize that there are instances where this cannot be done.
- The plan should not cease to operate upon the departure of any one individual.

In addition:

- When legally permissible, lotteries should financially contribute to problem gambling organizations, including memberships and sponsorships.
- Lotteries can provide in-kind assistance to these organizations as well by providing technical assistance in areas such as graphic design, advertising, and management support.



ADVICE TO APPLICANTS:

If you are applying at any level:

1. Tell us the details. It isn't enough to say, "we support the Holiday Campaign." Tell us exactly what you do (or plan to do) in support of the Holiday Campaign.
2. Don't assume that the assessors know about your organization. Do you have legislative mandates that affect responsible gambling programs? Do you have technical limitations that need to wait for the next contract bid to be resolved? Make sure the assessors know.
3. View this as an opportunity to improve. The fundamental purpose of the verification program is to create better lottery responsible gambling programs. Take this opportunity to examine the programs in other states, particularly those most comparable to your own. Even if you achieve verification, think critically about the assessors' comments and how you can use them to enhance your program. Even if you're applying at the implementation or sustaining levels, include any plans you have to improve. The assessors want to be coaches in addition to being referees, and are happy to give advice on anything you have under consideration.

If you are applying at the implementation or sustaining levels:

4. Be sure that your action items are linked to the plan. Also be prepared to demonstrate that your action items are sufficient to achieve the goals stated in your plan.
5. Don't just tell, show. Did you have a banner on your website in support of the Holiday Campaign? Attach a screen shot. Press release for Problem Gambling Awareness Month? Send it along. Remember that "verification" means that the assessors need to be able to verify.



NASPL ADVERTISING GUIDELINES

Approved March 19, 1999

Introduction

The producers and marketers of lottery products encourage responsible decision-making regarding lottery play by adults, and discourage abusive use of their products. The lottery industry urges that adults who choose to play the lottery, do so responsibly. Signatory NASPL members will conduct their advertising and marketing practices in accordance with the provisions of these Standards.

Content

1. Advertising should be consistent with principles of dignity, integrity, mission and values of the industry and jurisdictions.
 - Advertising should be consistent with principles of dignity, integrity, mission and values of the industry and jurisdictions.
 - Advertising should not portray product abuse, excessive play nor a preoccupation with gambling.
 - Advertising should not imply nor portray any illegal activity
2. Advertising should not degrade the image or status of persons of any ethnic, minority, religious group nor protected class.
3. Advertising by lotteries should appropriately recognize diversity in both audience and media, consistent with these standards.
4. Advertising should not encourage people to play excessively nor beyond their means.
 - Advertising and marketing materials should include a responsible play message when appropriate.
 - Responsible play public service or purchased media messages are appropriate, especially during large jackpot periods.
 - Support for compulsive gambling programs, including publications, referrals and employee training is a necessary adjunct to lottery advertising.
 - Advertising should not present, directly nor indirectly, any lottery game as a potential means of relieving any person's financial or personal difficulties.
 - Advertising should not exhort play as a means of recovering past gambling nor other financial losses.
 - Advertising should not knowingly be placed in or adjacent to other media that dramatize or glamorize inappropriate use of the product.



Tone

1. The Lottery should not be promoted in derogation of nor as an alternative to employment, nor as a financial investment nor a way to achieve financial security.
2. Lottery advertisements should not be designed so as to imply urgency, should not make false promises and should not present winning as the probable outcome.
3. Advertising should not denigrate a person who does not buy a lottery ticket nor unduly praise a person who does buy a ticket.
4. Advertising should emphasize the fun and entertainment aspect of playing lottery games and not imply a promise of winning.
5. Advertising should not exhort the public to wager by directly or indirectly misrepresenting a person's chance of winning a prize.
6. Advertising should not imply that lottery games are games of skill.

Minors

1. Persons depicted as lottery players in lottery advertising should not be, nor appear to be, under the legal purchase age.
2. Age restrictions should, at a minimum, be posted at the point of sale.
3. Advertising should not appear in media directed primarily to those under the legal age.
4. Lotteries should not be advertised nor marketed at venues where the audience is reasonably and primarily expected to be below the legal purchase age.
5. Advertising should not contain symbols nor language that are primarily intended to appeal to minors or those under the legal purchase age.
 - The use of animation should be monitored to ensure that characters are not associated with animated characters on children's programs.
 - Celebrity or other testimonials should not be used which would primarily appeal to persons under the legal purchase age.

Game Information

1. Odds of winning must be readily available to the public and be clearly stated.
2. Advertising should state alternative cash and annuity values where reasonable and appropriate.

Beneficiaries

1. Lotteries should provide information regarding the use of lottery proceeds.
2. Advertising should clearly denote where lottery proceeds go, avoiding statements that could be confusing or misinterpreted.

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