



To: Charlie Moore
From: Keith Whyte
Cc: Brianne Doura-Schawohl, Virginia Shoffstall, Adelaide Wilson
Date: Friday, July 20, 2020
Re: Responsible Gambling Issues

Thank you for the opportunity to provide comments on our concerns about problem gambling and responsible gambling issues that will likely impact Wyoming. Our three primary areas are 1) the increased risk for gambling problems due to COVID related financial stress and health problems, 2) The growth of legalized sports betting without adequate prevention programs and 3) the relaxation of restrictions on credit and electronic payments.

COVID

- Problem Gamblers less likely to have health, financial, and recovery capital.
- Job loss, furloughs, financial pressures, & lost income may lead to more gambling to try to win money.
- Closures & quarantines may exacerbate social isolation, anxiety, stress and depression & add further barriers to services, particularly traditional individual and group counseling, and self-help group meetings.
- Shift of new gamblers, recreational gamblers, heavy/at-risk gambling, and problem gamblers to online, and in Wyoming, illegal, options.

Sports Betting

- This report on recent research suggests that gambling problems may increase as sports gambling grows explosively at the same time that mobile and online technologies evolve to create seemingly unlimited types of wagering opportunities. Here are important highlights from a special review of more than 140 studies and reports on the connections between sports betting and gambling addiction.
- The rate of gambling problems among sports bettors is at least twice as high as among gamblers in general.
- When sports gambling is conducted online, the rate of problems is even higher, with one study of online sports gamblers indicating that 16% met clinical criteria for gambling disorder and another 13% showed some signs of gambling problems.

- Nearly half of American adults have bet on a sporting event. More and more are betting online, with 45% of sports wagering now taking place through the internet.
 - Early research shows that those who bet using mobile devices have higher rates of problem gambling.
- Live “In-Play” Betting: today’s sports gamblers can bet on much more than just the winner of a game. Sports gamblers can bet — during the game — on hundreds and potentially thousands of discrete events. Any aspect of a team or player’s performance or activity that can be measured is now a potential wager.
 - This shortens the lag between bet and reward, increasing the speed and frequency of gambling, which increases the risk of problematic behavior.
- Sports gambling is widespread among professional athletes. While no study of gambling among U.S. professional athletes is publicly available, such studies have been conducted elsewhere. One recent European report showed that 57% of professional athletes surveyed gambled on sports in the previous year, with 8% exhibiting problem gambling behavior, roughly three times greater than the general population.
- Data from 2018 shows that more than 75% of students gambled. This is a big concern given the risk-taking behavior that takes place in adolescence and young adulthood, along with gambling being more socially acceptable and glamorized than previously.
- More than 13% of adolescents wagered money on sports teams according to a study in 2017.
- Youth gamblers have higher rates of gambling problems than adults. Males are far more likely than females to both gamble on sports and to experience gambling problems.
- From 2004 to 2018, participation in fantasy sports gambling quadrupled — from 14 million to 57 million. Higher fantasy game participation is associated with significant increases in problem gambling severity.
- Heavy sports bettors who meet the criteria for clinical gambling disorder are typically male, young (up to age 35), single, fully employed, and have a high level of education. They think sports gambling is more skill than luck, suggesting they’re prone to distortions in thinking. They affiliate with others who favor sports betting, frequently taking advantage of different types of promotions, and are generally highly impulsive.
- Aggressive promotions in all forms of marketing and advertising make it more difficult for sports bettors who are trying to curtail their gambling. Ads that emphasize ‘free play,’ tout the ease of placing a bet, and offer risk-free bonuses are particularly problematic.
- Our full report, A Comprehensive Review of Sports Wagering and Gambling Addiction, is available at www.ncpgambling.org/sports-gambling

Payments

- Financial problems are one of the most common consequences of gambling addiction— borrowing money to relieve gambling-related financial problems is one criteria for gambling disorder.

- Increasing losses may lead to chasing, intensifying a cycle of desperation often driven by irrational and erroneous cognitions/low gambling literacy.
- Digital payments may increase these problems by allowing gamblers greater access to their funds more quickly.
- Each type of payment used for gambling—from cash to debit cards to e-wallets—can impact how quickly and easily individuals may access more money, how much they can obtain at a time, and additional costs, such as ATM fees or interest charges.
- Electronic funds may not be seen as “real” money, resulting in higher spending.
- Negative impacts may be particularly pronounced among people with gambling problems.

General

- We estimate 8,800 Wyoming citizens (2% of adults) currently meet criteria for gambling problems.
- Problem gambling or gambling addiction is an important public health concern and includes all gambling behavior patterns that compromise, disrupt or damage personal, family, or vocational pursuits. The essential features are increasing preoccupation with gambling, a need to bet more money more frequently, restlessness or irritability when attempting to stop, “chasing” losses, and loss of control manifested by continuation of the gambling behavior in spite of mounting, serious, negative consequences. In extreme cases, problem gambling can result in financial ruin, legal problems, loss of career and family, or even suicide.
- The estimated annual social cost to Wyoming families and communities from gambling-related bankruptcy, divorce, crime, and job loss is \$5.3 million, mainly in criminal justice and healthcare costs. Problem gamblers also have high rates of co-occurring substance abuse and mental health disorders, including smoking, alcohol use and abuse, drug use and abuse, depression, and suicidal behavior.
- The NCPG National Problem Gambling Helpline Network (1-800-522-4700) is a single national access point to local resources for those seeking help for a gambling problem. Help is available 24/7 and is 100% confidential. One call, text or chat will get you to problem gambling help anywhere in the U.S. 24/7/365. In 2019, the NCPG Helpline received 358 calls, texts, and chats from residents of Wyoming. As of June 2020 there have been 201 calls, texts, and chats from your state.
- We can never eliminate the disease of gambling addiction, but we can and must make better efforts to prevent and treat it.
- The expansion of legalized gambling in Wyoming will likely increase gambling participation and simultaneously increase problems.
- Everyone who profits from legalized gambling bears responsibility for gambling problems. Dedicating a portion of profits from gambling to mitigate gambling harm is an ethical imperative and an economic necessity. The only way to maximize benefits from legalized gambling is to minimize problem gambling.

- Best practices for state health agencies include the provisions below and we encourage the Wyoming Department of Health (DOH) to identify where its programs meet or exceed them, where there are gaps and identify necessary funds and plans to ensure its problem gambling programs meet them prior to any additional expansion of gambling.
 - designate a senior staffer to be solely responsible for problem gambling issues;
 - add brief gambling screens to intake/assessment and data tracking systems;
 - add gambling participation & problem symptom questions to existing surveillance, monitoring and survey efforts;
 - develop state- and culturally-specific basic materials on gambling addiction;
 - develop a plan to train all DOH behavioral health counselors in basic screening, assessment, treatment & referral;
 - identify counselors with prerequisite education and certification to receive advanced training with goal to achieve national certification and become trainers.

Research

- When considering new and expanded gambling legislation, regulations, policy, or programs, the regulator should consider the precautionary principle, that there is a social responsibility to protect the public from exposure to harm, when scientific investigation has found a plausible risk.
- It is crucial that Wyoming fund research PRIOR to the expansion of sports betting and periodic monitoring be conducted thereafter to support evidence-based, data-driven responsive measures opportunities, and get the necessary information and baseline information on problem gambling.

Internet Gambling

- The National Council on Problem Gambling has developed the Internet Responsible Gambling Standards to help guide discussions among all stakeholders on internet gambling, and in many ways all types of gambling policy for legislators, operators, regulators, advocates and the public.
- The standards contain specific recommendations in the areas of policy, staff training, informed decision-making, assisting players, self-exclusion, advertising and promotion, game and site features, and working with research.