



February 26, 2019

Governor J.B. Pritzker
Office of the Governor
207 State House
Springfield, IL 62706

Re: Sports Wagering Act

Dear Governor Pritzker:

On behalf of The National Council on Problem Gambling (NCPG) and the Illinois Council on Problem Gambling we are writing you today as the sole national advocates for problem gamblers and their loved ones. Our mission is to lead state and national stakeholders in the development of comprehensive policy and programs for all those affected by problem gambling. Our vision is to improve health and wellness by reducing the personal, social and economic costs of problem gambling. The National and Illinois Councils are neither for nor against legalized gambling.

The National Council's 47-year-old history and neutrality makes us the most credible voice on gambling addiction. We'd like to take this opportunity to express our concerns about some of the deficits pertaining to the problem and responsible gambling provisions within SB0176, the Sports Wagering Act.

There is an estimated 216,000 (2.2% of the adult population) Illinois citizens currently with a gambling problem. The historic failure to address this issue costs the state of Illinois and hurts its most vulnerable citizens. In 2016, Illinois ranked 28th out of 50 U.S. states in terms of per capita public funds dedicated to problem gambling services. The average allocation of per capita funds in Illinois is 8 cents, whereas the national average is 37 cents per capita.

NCPG believes that the expansion of legalized sports gambling will likely increase gambling participation while simultaneously increasing problems. We advise that the following items be amended into your statute which are designed and proven to minimize harm.

The only ethical and economical path is to make sure that public funds are dedicated solely to prevent and treat increased gambling problems that are a direct consequence of expanded gambling. We advise that 1% of the revenue generated from your expanded gambling be allocated for problem gambling services. These funds should be made available to your health agencies and other private non-profits with problem gambling expertise.



It's essential that this funding be utilized for problem gambling research, prevention, intervention, treatment and recovery programs. NCPG strongly encourages that a prevalence survey of gambling addiction also be funded and conducted prior to this expansion and then at regular periods thereafter in order to monitor impacts of legalized sports betting. The data garnered will be helpful in implementing evidence-based mitigation efforts, maximizing your results to keeping unintended negative consequences of gambling to a minimum.

Furthermore, NCPG advises that all operators be required to have responsible gambling programs. Operators should have a written plan with measurable objectives and an annual report that reviews their progress. This responsible gambling audit should be given to both the regulator and be available for public review. Compliance with the responsible gambling regulations and performance should be a condition of licensure and renewal.

The proposed self-exclusion program should allow individuals to exclude themselves from all forms of gambling and not just sports wagering. We strongly believe that players who wish to self-exclude should be able to do so via the operator or an outside service recognized by your regulatory agency. Additionally, family members should be able to request a gambler to be banned through a process adjudicated by the regulator.

The statute either lacks or needs stronger language about requirements surrounding employee training, credit extension to players, programming to allow for players to be able to set daily, weekly or monthly, deposit, loss, win and time limits prior to the onset of gaming, and advertising guidelines that include a requirement of operators to include the problem gambling helpline number, problem gambling resources and a responsible gaming message on all materials.

Given that this statute would legalize internet, mobile, and online gambling options we need to consider the additional increased risk factors for gambling addiction. Legislation and regulations should mandate operators to utilize the technology to its fullest potential adding enhanced responsible gaming features that comply with NCPG's best practices for Internet Responsible Gambling Standards (IRGS). Examples include but are not limited to; geolocation, age verification, personalized information about individual play, limit setting tools and other information to help players make informed decisions about their gambling.

As with all forms of gambling, there will be a significant portion of the population that will experience negative consequences as a result of sports betting. It is incumbent upon you to protect individuals from addiction issues that are highly likely to be unintended consequences of sports betting. Our neutrality on legalized gambling, means that we are not taking a position for or against SB0176 or other gambling bills. Our primary goal is to ensure protections are in place



to prevent Illinois residents from developing gambling problems and to ensure services are readily available to treat those who currently have or develop this devastating disorder. Comprehensive problem gambling and responsible gaming programs are critical if Illinois wishes to reduce criminal justice and healthcare costs of gambling addiction.

Together with all stakeholders who will profit from sports betting our challenge is to implement measures to reduce that harm as much as possible even as sports gambling expands across the nation. We hope to build a strong relationship with you to work through these struggles and build a comprehensive problem gambling infrastructure within Illinois. We appreciate your time and consideration. Please feel free to contact us with any questions.

Sincerely,

Keith Whyte, Executive Director

National Council on Problem Gambling

CC:

Elizabeth Thielen, LPC, PCGC Senior Director, Substance Abuse Treatment Services

Bill Johnson, Administrator, Illinois Council on Problem Gambling

Brianne Doura, Legislative Director, National Council on Problem Gambling