

<h2 style="margin: 0;">Regulatory Analysis Form</h2> <p style="margin: 0;">(Completed by Promulgating Agency)</p> <p style="margin: 0;"><b>(All Comments submitted on this regulation will appear on IRRC's website)</b></p>	<p style="margin: 0;"><b>INDEPENDENT REGULATORY REVIEW COMMISSION</b></p> <p style="margin: 0;"><b>RECEIVED</b></p> <p style="margin: 0;">Independent Regulatory Review Commission</p> <p style="margin: 0;">March 20, 2024</p> <p style="margin: 0;">IRRC Number: 3397</p>
<p>(1) Agency Pennsylvania Gaming Control Board</p>	
<p>(2) Agency Number: 125 Identification Number: 247</p>	
<p>(3) PA Code Cite: 58 Pa.Code §§ 603a, 633a, 687a, 812a, and 819a</p>	
<p>(4) Short Title: Direct Bet Coupons, Interactive Gaming Progressives, and Misc. Corrections</p>	
<p>(5) Agency Contacts (List Telephone Number and Email Address):</p> <p>Primary Contact: Robert Wood Assistant Chief Counsel Pennsylvania Gaming Control Board 303 Walnut Street Commonwealth Tower, 5<sup>th</sup> Floor Harrisburg, PA 17101 Phone: (717) 317-5744 Email: rmwood@pa.gov</p> <p>Secondary Contact:</p>	
<p>(6) Type of Rulemaking (check applicable box):</p> <p><input checked="" type="checkbox"/> Proposed Regulation</p> <p><input type="checkbox"/> Final Regulation</p> <p><input type="checkbox"/> Final Omitted Regulation</p>	<p><input type="checkbox"/> Emergency Certification Regulation;</p> <p><input type="checkbox"/> Certification by the Governor</p> <p><input type="checkbox"/> Certification by the Attorney General</p>
<p>(7) Briefly explain the regulation in clear and nontechnical language. (100 words or less)</p> <p><b>This proposed rulemaking is to provide standards for the issuance and use of direct bet coupons, to provide the standards for progressives in interactive gaming, to make edits to final form table games rules, and to amend certain interactive gaming account standards.</b></p>	
<p>(8) State the statutory authority for the regulation. Include <u>specific</u> statutory citation.</p> <p><b>The Pennsylvania Gaming Control Board has the authority pursuant to 4 Pa.C.S. §§ 1202(b)(30); 13A02 (1)-(2); and 13B02(a)(3), (6)-(7), (9)</b></p>	

(9) Is the regulation mandated by any federal or state law or court order, or federal regulation? Are there any relevant state or federal court decisions? If yes, cite the specific law, case or regulation as well as, any deadlines for action.

**The provisions of this proposed rulemaking are not the result of any direct mandate by federal or state law, court order or federal regulation. The regulations are proposed in line with the general oversight mandates as prescribed in the Pennsylvania Race Horse Development and Gaming Act of 2004, as amended.**

(10) State why the regulation is needed. Explain the compelling public interest that justifies the regulation. Describe who will benefit from the regulation. Quantify the benefits as completely as possible and approximate the number of people who will benefit.

**As noted, the proposed regulations are in line with the oversight mandate prescribed to the Pennsylvania Gaming Control Board. Specifically, the direct bet coupon framework, offered under § 603a., ensures that brick-and-mortar casino operations are able to remain competitive compared to online and out-of-state competitors. The interactive gaming progressive framework, offered under § 819a., provides the framework under which interactive gaming operators will be able to offer progressive wagers to players. The edits to table games rules under §§ 633a and 687a ensure that gaming products are able to be offered as intended by manufacturers, and that players are provided competitive gaming products. Finally, the proposed edit under §812a corrects an inconsistency relating to interactive gaming account time out periods.**

(11) Are there any provisions that are more stringent than federal standards? If yes, identify the specific provisions and the compelling Pennsylvania interest that demands stronger regulations.

**There are no corresponding federal standards for any of these provisions in this rulemaking.**

(12) How does this regulation compare with those of the other states? How will this affect Pennsylvania's ability to compete with other states?

**This rule making is comparable to the regulatory standards imposed by other states. The proposed regulations governing direct bet coupons ensure that Pennsylvania casinos remain competitive compared to those in neighboring jurisdictions, where casinos already have this ability. All provisions of this proposed rulemaking do not negatively impact competition. Rather the changes are expected to allow Pennsylvania gaming entities to remain competitive compared to their peers.**

(13) Will the regulation affect any other regulations of the promulgating agency or other state agencies? If yes, explain and provide specific citations.

**This regulation will not affect any other regulations of the PGCB nor any other state agency.**

(14) Describe the communications with and solicitation of input from the public, any advisory council/group, small businesses and groups representing small businesses in the development and drafting of the regulation. List the specific persons and/or groups who were involved. ("Small business" is defined in Section 3 of the Regulatory Review Act, Act 76 of 2012.)

**No other persons or groups were involved in the development and drafting of the regulation.**

(15) Identify the types and number of persons, businesses, small businesses (as defined in Section 3 of the Regulatory Review Act, Act 76 of 2012) and organizations which will be affected by the regulation. How are they affected?

**The Board anticipates that these regulations will affect its licensed operators and manufacturers. Should they wish to engage in the activities covered by the regulation they will be required to abide by the regulation. It is unknown to the Board at this time whether any of these entities would qualify as small businesses as defined in the United States Small Business Administration's Small Business Size Regulations, under 13 C.F.R. Ch. 1 Part 121.**

(16) List the persons, groups or entities, including small businesses, that will be required to comply with the regulation. Approximate the number that will be required to comply.

**The proposed regulations only affect Pennsylvania's regulated gaming industry--casino licensees, interactive gaming operators, and manufacturers. These include 17 operations brick-and-mortar casino facilities, one casino facility yet to be opened, more than 20 online casino/apps offerings, and approximately 109 manufacturers.**

(17) Identify the financial, economic and social impact of the regulation on individuals, small businesses, businesses and labor communities and other public and private organizations. Evaluate the benefits expected as a result of the regulation.

**It is not anticipated that this rulemaking will have a negative financial or economic impact on the regulated community. Rather, the express authorization of activities prescribed by Annex A could reasonably provide positive economic growth to both the regulated community and the Commonwealth by means of increased gaming taxes.**

(18) Explain how the benefits of the regulation outweigh any cost and adverse effects.

**The proposed regulations accomplish four items. First, they authorize brick-and-mortar casinos in Pennsylvania to use promotional products allowed by other neighboring jurisdictions. Authorization in Pennsylvania ensures PA's gaming market remains competitive. Second, the regulations provide for a framework for interactive gaming progressive wagers. These wagers are common in both brick-and-mortar and online gaming. The adoption of the proposed framework ensures all regulated entities are apprised of the minimum standards and expectations. Third, the proposed changes to table games rules and procedures ensure that table games offered in Pennsylvania remain competitive. Fourth, the edit to iGaming time out periods create a more consistent standard for the industry. On the whole, this proposed regulation package increases the ability of the regulated industry to remain competitive with out-of-state competition and provides frameworks and corrections which reasonably can reduce operational administration costs by licensees. It is not anticipated there will be any significant cost or adverse effects to the affected parties**

(19) Provide a specific estimate of the costs and/or savings to the **regulated community** associated with compliance, including any legal, accounting or consulting procedures which may be required. Explain how the dollar estimates were derived.

**There is anticipated to be negligible economic impact on the regulated community as a result of this proposed regulation package. To the extent that the regulated community may incur upstart fees if they choose to engage in a direct bet couponing program, the Board cannot speculate as to implementation costs, but does believe that any cost incurred would be surpassed by increased operational revenues resulting from the program. The remaining portions of this proposed rulemaking reflect frameworks and corrections that do not place economic burden upon the regulated community.**

(20) Provide a specific estimate of the costs and/or savings to the **local governments** associated with compliance, including any legal, accounting or consulting procedures which may be required. Explain how the dollar estimates were derived.

**This rulemaking will have no fiscal impact on local governments.**

(21) Provide a specific estimate of the costs and/or savings to the **state government** associated with the implementation of the regulation, including any legal, accounting, or consulting procedures which may be required. Explain how the dollar estimates were derived.

**The Board does not expect that the requirements of this rulemaking will have any fiscal impact on the Board or any other Commonwealth agency. Any work resulting from this proposed rulemaking will be handled by existing Board staff.**

(22) For each of the groups and entities identified in items (19)-(21) above, submit a statement of legal, accounting or consulting procedures and additional reporting, recordkeeping or other paperwork, including copies of forms or reports, which will be required for implementation of the regulation and an explanation of measures which have been taken to minimize these requirements.

**The proposed rulemaking relating to direct bet coupons places recordkeeping and reporting requirements upon any licensee that would choose to engage in a direct bet coupon promotional program. The main recordkeeping requirement, the Direct Bet Coupon Ledger, serves as an inventory/liability log. This ensures that licensees are controlling the inventory of direct bet coupons and reporting variances or discrepancies. Directly derived from this recordkeeping requirement is the requirement for monthly reporting to the Board the values of coupons issued and redeemed by patrons. All recordkeeping and reporting requirement proposed relative to Direct Bet Coupons are comparable to those required under 58 Pa. Code §603a.20 relative to Match Play Coupons.**

**With regards to the remaining portions of this proposed rulemaking, there are no significant changes to procedures, reporting, recordkeeping, etc. already required by Board licensees.**

(22a) Are forms required for implementation of the regulation?

**To the extent that licensees make submissions for review of games, gaming devices, equipment, hardware, or software, they would be expected to comply with existing PGCB procedures and forms.**

(22b) If forms are required for implementation of the regulation, **attach copies of the forms here.** If your agency uses electronic forms, provide links to each form or a detailed description of the information required to be reported. **Failure to attach forms, provide links, or provide a detailed description of the information to be reported will constitute a faulty delivery of the regulation.**

**The forms used for submissions to the PGCB Gaming Lab and for table games submission are voluminous. They can be found at <https://gamingcontrolboard.pa.gov/?p=65> and <https://gamingcontrolboard.pa.gov/?p=187>. PGCB staff works with licensees and applicants to direct them to the appropriate form for their submissions.**

(23) In the table below, provide an estimate of the fiscal savings and costs associated with implementation and compliance for the regulated community, local government, and state government for the current year and five subsequent years.

	<b>Current FY Year</b>	<b>FY +1 Year</b>	<b>FY +2 Year</b>	<b>FY +3 Year</b>	<b>FY +4 Year</b>	<b>FY +5 Year</b>
<b>SAVINGS:</b>	\$	\$	\$	\$	\$	\$
<b>Regulated Community</b>	N/A	N/A	N/A	N/A	N/A	N/A
<b>Local Government</b>	N/A	N/A	N/A	N/A	N/A	N/A
<b>State Government</b>	N/A	N/A	N/A	N/A	N/A	N/A
<b>Total Savings</b>	N/A	N/A	N/A	N/A	N/A	N/A
<b>COSTS:</b>						
<b>Regulated Community</b>	N/A	N/A	N/A	N/A	N/A	N/A
<b>Local Government</b>	N/A	N/A	N/A	N/A	N/A	N/A
<b>State Government</b>	N/A	N/A	N/A	N/A	N/A	N/A
<b>Total Costs</b>	N/A	N/A	N/A	N/A	N/A	N/A
<b>REVENUE LOSSES:</b>						
<b>Regulated Community</b>	N/A	N/A	N/A	N/A	N/A	N/A
<b>Local Government</b>	N/A	N/A	N/A	N/A	N/A	N/A
<b>State Government</b>	N/A	N/A	N/A	N/A	N/A	N/A
<b>Total Revenue Losses</b>	N/A	N/A	N/A	N/A	N/A	N/A

(23a) Provide the past three year expenditure history for programs affected by the regulation.

<b>Program</b>	<b>FY -3 2020-2021</b>	<b>FY -2 2021-2022</b>	<b>FY -1 2022-2023</b>	<b>Current FY 2023-2024</b>
PGCB Overall Budget	\$43,357,000	\$46,637,000	\$48,189,000	\$52,159,000

(24) For any regulation that may have an adverse impact on small businesses (as defined in Section 3 of the Regulatory Review Act, Act 76 of 2012), provide an economic impact statement that includes the following:

- (a) An identification and estimate of the number of small businesses subject to the regulation.

**The Board does not believe this proposed rulemaking will affect any small businesses. To the extent that a Board licensee may qualify as a small business and be subject to the proposed rulemaking, it is not anticipated that the regulation will have any adverse impact on any business.**

- (b) The projected reporting, recordkeeping and other administrative costs required for compliance with the proposed regulation, including the type of professional skills necessary for preparation of the report or record.

**It is not anticipated that there will be any significant reporting, recordkeeping or other administrative costs associated with this proposed regulation that a licensee does not already perform based upon licensure in Pennsylvania or other jurisdictions, or as a matter of industry best practices.**

- (c) A statement of probable effect on impacted small businesses.

**As stated above, the Board does not believe any of the entities subject to the regulation are small businesses. However, any impact will be limited to those entities wishing to engage in the covered activity, which would not be an adverse impact.**

- (d) A description of any less intrusive or less costly alternative methods of achieving the purpose of the proposed regulation.

**It is not believed that there is a less intrusive or less costly alternative method available.**

(25) List any special provisions which have been developed to meet the particular needs of affected groups or persons including, but not limited to, minorities, the elderly, small businesses, and farmers.

**No special provisions have been added.**

(26) Include a description of any alternative regulatory provisions which have been considered and rejected and a statement that the least burdensome acceptable alternative has been selected.

**No alternative regulatory approaches were considered as this rulemaking as this regulation reflects the least burdensome means of maintaining regulatory oversight of these activities.**

(27) In conducting a regulatory flexibility analysis, explain whether regulatory methods were considered that will minimize any adverse impact on small businesses (as defined in Section 3 of the Regulatory Review Act, Act 76 of 2012), including:

- a) The establishment of less stringent compliance or reporting requirements for small businesses;
- b) The establishment of less stringent schedules or deadlines for compliance or reporting requirements for small businesses;
- c) The consolidation or simplification of compliance or reporting requirements for small businesses;
- d) The establishment of performance standards for small businesses to replace design or operational standards required in the regulation; and
- e) The exemption of small businesses from all or any part of the requirements contained in the regulation.

**It is believed there will be no adverse impact on small businesses.**

(28) If data is the basis for this regulation, please provide a description of the data, explain in detail how the data was obtained, and how it meets the acceptability standard for empirical, replicable and testable data that is supported by documentation, statistics, reports, studies or research. Please submit data or supporting materials with the regulatory package. If the material exceeds 50 pages, please provide it in a searchable electronic format or provide a list of citations and internet links that, where possible, can be accessed in a searchable format in lieu of the actual material. If other data was considered but not used, please explain why that data was determined not to be acceptable.

**There is no data, as defined under section (3) of the Regulatory Review Act (71 P.S. § 745.3), upon which this rulemaking is based.**

(29) Include a schedule for review of the regulation including:

- |   |  |
|---|--|
| A. The length of the public comment period:   | <b>30 days</b>                                     |
| B. The date or dates on which any public meetings or hearings will be held:               | <b>Held January 24, 2024</b>                       |
| C. The expected date of delivery of the final-form regulation:                            | <b>2<sup>nd</sup>/3<sup>rd</sup> quarter, 2024</b> |
| D. The expected effective date of the final-form regulation:                              | <b>Upon final publication</b>                      |
| E. The expected date by which compliance with the final-form regulation will be required: | <b>Upon final publication</b>                      |

F. The expected date by which required permits, licenses or other approvals must be obtained:

**Ongoing**

(30) Describe the plan developed for evaluating the continuing effectiveness of the regulations after its implementation.

**No formal review schedule has been established. Instead, the Board consistently reviews its regulations and proposes amendments as the need arises.**



CDL-1

**FACE SHEET  
FOR FILING DOCUMENTS  
WITH THE LEGISLATIVE REFERENCE BUREAU  
(Pursuant to Commonwealth Documents Law)**

**RECEIVED**

Independent Regulatory  
Review Commission

March 20, 2024

DO NOT WRITE IN THIS SPACE

Copy below is hereby approved as to  
form and legality. Attorney General

BY: \_\_\_\_\_  
(DEPUTY ATTORNEY GENERAL)

3/13/2024

DATE OF APPROVAL

Check if applicable  
Copy not approved. Objections  
attached.

Copy below is here by certified to be a true and correct copy  
of a document issued, prescribed or promulgated by:

Pennsylvania Gaming Control Board  
(AGENCY)

DOCUMENT/FISCAL NOTE NO. 125-247

DATE OF ADOPTION: January 24, 2024

BY: 

TITLE Denise J. Smyler, Chair  
(EXECUTIVE OFFICER, CHAIRMAN OR SECRETARY)

Copy below is hereby approved as to form  
and legality. Executive or Independent Agencies.

BY:   
Stephen S. Cook, Chief Counsel

January 24, 2024  
DATE OF APPROVAL

(Chief Counsel, Independent Agency)  
(Strike inapplicable title)  
Check if applicable. No Attorney General  
approval or objection within 30 days after  
submission.

**PROPOSED RULEMAKING 125-247**

**PENNSYLVANIA GAMING CONTROL BOARD**

**58 PA. CODE CH. 603a, 633a, 687a, 812a, and 819a**

**Table Game Equipment; Blackjack; DJ Wild Stud Poker; Interactive Gaming Player Accounts; and Interactive Gaming Progressives**

The Pennsylvania Gaming Control Board (Board), under authority pursuant to 4 Pa.C.S. §§ 1202(b)(30) (relating to general and specific powers), 13A02 (1)-(2) (relating to table games regulatory authority), and 13B02(a)(3), (6)-(7), (9) (relating to interactive gaming regulatory authority) proposes to amend Subpart K. Table Games by adding sections 603a.22 (Direct Bet Coupons; physical characteristics and issuance) and 603a.23 (Direct Bet Coupon Use) and by amending chapters 633a. (Blackjack) and 687a. (DJ Wild Stud Poker), and proposes to amend Subpart L. Interactive Gaming by adding chapter 819a (Interactive Gaming Progressives) and by amending section 812a.9.

*Purpose of the Proposed Rulemaking*

This proposed rulemaking is to provide standards for the issuance and use of direct bet coupons, to provide standards for interactive gaming progressive wagers, and to amend certain provisions in table games rules and interactive gaming player account controls.

*Explanation*

Under Annex A, Chapter 603a is amended to add sections 603a.22 (Direct Bet Coupons; physical characteristics) and 603a.23 (Direct Bet Coupon Use). The addition of these sections provide for the authorization and framework for the issuance and use of Direct Bet Coupons, a promotional product in brick-and-mortar casinos. Direct Bet Coupons operate similarly to Match Play Coupons, authorized under sections 603a.20 and 603a.21, except that Direct Bet Coupons do not require players to at least match the promotional play value with money out of their pockets. Direct Bet Coupons will allow Pennsylvania licensees to offer a promotional product similar to those allowed by competing casinos in neighboring jurisdictions.

The Direct Bet Coupon regulations contemplates licensees utilizing computerized systems for instantaneous creation of

Direct Bet Coupons (patron operated kiosks or casino staff operated computer/printer system), or Direct bet Coupons printed by either gaming service providers or the licensees themselves (non-instantaneously produced). These non-instantaneously produced coupons represent "blanks" that may not contain all the required identifying information required under subsection (d) while held in inventory but must contain subsection (d) information at the time they are being issued to a patron for use. Instantaneously produced coupons must contain all subsection (d) information at time of printing, as this also represents the time of issuance to the patron.

A distinguishing procedural consideration between instantaneously produced and non-instantaneously produced coupons is that non-instantaneously produced coupons require additional inventory, control, and reconciliation procedures to ensure the "blank" coupons are not accidentally or intentionally misplaced or misappropriated. Instantaneously produced coupons are printed, or produced, at the time of issuance, meaning there are not "blank" coupons to be inventoried, controlled, monitored, and reconciled. Regardless of production method, all Direct Bet Coupons issued to patrons will be required to be accounted for in the Direct Bet Coupon Ledger and the monthly reporting to the Board.

Also under Annex A, Subpart L. Interactive Gaming, is being amended to add Chapter 819a. Interactive Gaming Progressives. This addition adds to interactive gaming regulations a framework for licensees to offer progressive wagers in the online gaming market. Specifically, section 819a.1 addresses an interactive gaming operator offering progressive wagers. Section 819a.2 provides the framework by which interactive gaming progressive wagers will be allowed to be offered collaboratively between multiple interactive gaming operators.

Annex B of this proposed rulemaking seeks to edit existing final form regulations. The first proposed edit updates §633a.13(k) to remove an antiquated payable to ensure that payouts to patrons reflect probabilities of occurrence of events—namely that winning events with lower probabilities of occurrence (harder hands to achieve) should be rewarded with greater potential payouts.

Next, two edits are proposed to chapter 687a, which provides the table game rules for DJ Wild Stud Poker. The first edit is to the Two-Way Bad Beats Bonus Wager, under § 687a.11(f) (3). As presently written in the regulations, this optional side wager

operates as a traditional bad beats wager, rather than as the two-way wager that was intended. The revision corrects the regulatory language to provide that when either the player's or dealer's hand is comprised of a three-of-a-kind or better and loses, then the Two-Way Bad Beats Bonus Wager shall be deemed to have won. The second edit is to Paytable 1 under § 687a.12(c). The regulation presently provides for a \$2,000 seed/re-seed. Review of the initial submission to PGCB reflects that Paytable 1 should consist of a \$10,000 seed/re-seed.

The final proposed amendment, presented as part of Annex B, seeks to change the 30-minute timeout under §812a.9(c)(1) to a 15-minute timeout. This change would make the failure to receive a response timeout under § 812a.9(c)(1) match the requirement that a player re-enter their password after 15 minutes of player inactivity as provided by § 812a.3(a)(6).

#### *Fiscal Impact*

*Commonwealth.* The Board does not expect that this proposed rulemaking will have a fiscal impact on the Board or other Commonwealth agencies. All work created because of this proposed rulemaking will be handled by existing Board staff.

*Political subdivisions.* This proposed rulemaking will not have fiscal impact on political subdivisions of this Commonwealth.

*Private sector.* This proposed rulemaking will provide the regulated gaming market with increased promotion and game/wager options, while additionally providing clarifications by way of corrective edits. To the extent that the private sector may experience a fiscal impact, it is anticipated to be a positive fiscal impact.

*General public.* This proposed rulemaking will not have fiscal impact on the general public.

#### *Paperwork Requirements*

Licensees seeking to operate a direct bet coupon program will be required to maintain a Direct Bet Coupon Ledger and make periodic reports to the Board regarding direct bet coupon issuance and usage. Additionally, licensees would be required to make submissions for lab review software and hardware systems that would facilitate their direct bet coupon programs and would be required to submit appropriate forms to the Board for product

review. These forms constitute the same paperwork requirement for any PGCB lab submission.

Licensees seeking to operate an interactive gaming wide area progressive system will be required to submit for Board review and approval an interactive gaming wide area progressive agreement. This agreement will outline the roles and responsibilities of participating parties. This submission and the Board review and approval requirement is consistent with the process required for slot machine wide area progressive systems under 58 Pa. Code §461a.13.

All other provisions of this proposed rulemaking will not create paperwork requirement beyond the established procedures for table games submissions and/or lab review submissions.

#### *Effective Date*

The proposed rulemaking will become effective upon final-form publication in the *Pennsylvania Bulletin*.

#### *Public Comments*

Interested persons are invited to submit written comments, suggestions or objections regarding the proposed rulemaking within 30 days after the date of publication in the *Pennsylvania Bulletin*. Public comments should be addressed to Robert Wood, Assistant Chief Counsel, Attention: Regulation #125-247 Public Comment, Pennsylvania Gaming Control Board, 303 Walnut Street, 5<sup>th</sup> Floor, Harrisburg, PA 17101, or submitted by way of electronic mail, subject: Regulation #125-247 to [PGCBregs@pa.gov](mailto:PGCBregs@pa.gov).

#### *Contact Person*

The contact person for questions about this proposed rulemaking is Robert Wood, Assistant Chief Counsel, (717) 346-8300.

#### *Regulatory Review*

Under section 5(a) of the Regulatory Review Act (71 P.S. § 745.5(a)), on **INSERT DATE HERE**, the Board submitted a copy of this proposed rulemaking and a copy of the Regulatory Analysis Form to the Independent Regulatory Review Commission (IRRC) and to the Chairpersons of the House Gaming Oversight Committee and the Senate Community, Economic and Recreational Development Committee. A copy of this material is available to the public

upon request and is available on the Board's web site at [www.gamingcontrolboard.pa.gov](http://www.gamingcontrolboard.pa.gov).

Under section 5(g) of the Regulatory Review Act, IRRC may convey any comments, recommendations or objections to the proposed rulemaking within 30 days of the close of the public comment period. The comments, recommendations or objections must specify the regulatory review criteria which have not been met. The Regulatory Review Act specifies detailed procedures for review, prior to final publication of the rulemaking, by the Board, the General Assembly and the Governor of comments, recommendations or objections raised.

DENISE J. SMYLER,  
Chairperson

**Annex A**  
**TITLE 58. RECREATION**  
**PART VII. GAMING CONTROL BOARD**

**SUBPART K. TABLE GAMES**

**CHAPTER 603a. TABLE GAME EQUIPMENT**

**§ 603a.22. Direct Bet Coupons; physical characteristics and issuance.**

**(a) A certificate holder may utilize Direct Bet Coupons in accordance with this section.**

**(b) Direct Bet Coupons may be produced instantaneously through the use of computerized systems such as player operated kiosks or a system utilized by casino staff, or may be received from a gaming service provider or produced by the certificate holder.**

**(c) Direct Bet Coupons may not be issued by a certificate holder or utilized in a licensed facility until:**

**(1) The design specifications of the proposed coupons are submitted to the Bureau of Gaming Operations and approved in accordance with § 601a.10(a) (relating to approval of table game layouts, signage and equipment).**

**(2) A system of internal procedures and administrative and accounting controls governing the inventory, distribution and redemption of the coupons is submitted and approved as part of the certificate holder's internal controls in accordance with § 465a.2 (relating to internal control systems and audit protocols).**

**(d) All Direct Bet Coupons issued to a patron by a certificate holder must contain:**

**(1) The name or logo of the certificate holder.**

(2) The value of the coupon which can be identified when viewing the coupon through the surveillance system of the certificate holder.

(3) A serial number, barcode, QR code, and/or other mechanism to be used to identify, verify, and track coupons.

(4) Restrictions regarding redemption including the type of game and wagers on which the coupon may be used.

(5) A statement specifying the date on which the coupon expires, which can be identified when viewing the coupon through the surveillance system of the certificate holder.

(6) The name or player identification number of the rated player for whom the coupon is being issued to.

(e) The marketing department, or other department as specified in the certificate holder's internal controls, and the finance department shall be responsible for administering the Direct Bet Coupon program. The marketing department shall be responsible for distributing the coupons to patrons. The finance department shall be responsible for maintaining the Direct Bet Coupon ledger and administering the coupon accounting procedures in subsection (f).

(f) Each certificate holder shall maintain a Direct Bet Coupon ledger which serves as an inventory of Direct Bet Coupons, which shall comply with the following:

(1) The Direct Bet Coupon ledger shall contain all of the following information relating to coupons produced instantaneously:



(i) Serial number.

(ii) Date and time of issuance.

(iii) Value of coupon(s).

(iv) Status of the coupon—i.e. issued, expired, voided, redeemed.

(2) The Direct Bet Coupon ledger shall contain inventory information relating to coupons received from a gaming service provider or produced by the certificate holder, as further outlined under subsection (i).

(g) Documentation, voided coupons, redeemed coupons and coupons that were not distributed to patrons shall be forwarded on a daily basis to the finance department where the coupons shall be:

(1) Counted and examined for proper calculation and recording.

(2) Reviewed for the propriety of signatures on the documentation and cancelled.

(3) Reconciled by total number of coupons given to the marketing department for distribution to patrons, returned for reissuance, voided, distributed to patrons and redeemed.

(4) Recorded, maintained and controlled by the finance department.

(h) Each certificate holder shall prepare and file with the Bureau of Casino Compliance a monthly report which lists, by denomination of Direct Bet Coupon, the total value of the coupons issued to patrons, as well as the total value of the coupons redeemed by patrons.

(i) If the Direct Bet Coupons are received from the gaming service provider or produced by the certificate holder:

(1) Direct Bet Coupons shall be opened and examined by at least one member of the finance department and one member of the marketing department. Any deviation between the invoice accompanying the coupons and the actual coupons received shall be immediately reported to a supervisor from the finance department and to the Bureau of Casino Compliance.

(2) A finance department supervisor shall record the following information in the Direct Bet Coupon ledger:

(i) The date the coupons were received.

(ii) The quantity and denomination of coupons received.

(iii) The beginning and ending serial number of the coupons received.

(iv) The name, signature and Board-issued credential number of the individuals who checked the coupons.

(3) A marketing department supervisor shall estimate the number of Direct Bet Coupons needed for each gaming day or promotion and complete a requisition document which contains the following information:

(i) The date the requisition was prepared.

(ii) The date for which the coupons are needed.

(iii) The denomination and quantity of coupons requested.

(iv) The name, signature and Board-issued credential number of the marketing department supervisor completing the requisition.

(v) The name, signature and Board-issued credential number of the finance department supervisor authorizing the requisition.

(4) Upon receipt of the requisition document, the finance department supervisor shall record in the Direct Bet Coupon ledger the following information before the coupons are issued to the marketing department supervisor:

(i) The beginning and ending serial number of the coupons issued.

(ii) The denomination and quantity of coupons issued.

(iii) The name, signature and Board-issued credential number of the finance department supervisor who issued the coupons.

(iv) A record and explanation of coupons that were voided.

(5) Direct Bet Coupons that are not issued to the marketing department shall be controlled by a finance department supervisor or above and stored in a secured and locked area approved by the Bureau of Casino Compliance in accordance with § 601a.10(g) (relating to approval of table game layouts, signate and equipment). The certificate holder shall include in its internal controls the location of the approved storage area.

(6) The marketing department shall maintain a daily Direct Bet Coupon Reconciliation Form which must contain:

(i) The date.

(ii) The beginning and ending serial numbers of the coupons received from the finance department.

(iii) The denomination and quantity of coupons the marketing department has to distribute to patrons.

(iv) The denomination and quantity of coupons the marketing department distributed to patrons.

(v) The denomination, quantity and serial numbers of coupons remaining.

(vi) The serial numbers of coupons that were voided and the reason the coupons were voided.

(vii) Variations discovered and an explanation of the variations.

(viii) The name, signature and Board-issued credential number of the marketing department supervisor completing the form.

(j) At the end of the gaming day a copy of the Direct Bet Coupon Reconciliation Form and Direct Bet Coupons that were not distributed to patrons shall be returned to the finance department. The marketing department may keep for use during the next gaming day coupons that were not distributed to patrons provided the coupons are stored in a secured and locked area approved by the Bureau of Casino Compliance in accordance with § 601a.10(f) (relating to approval of table game layouts, signate and equipment) and recoded on the daily Direct Bet Coupon Reconciliation Form for the next gaming day. Expired coupons shall be returned to the finance department on a daily basis.

(k) At least once every month, each certificate holder shall inventory the Direct Bet Coupons that are not distributed to patrons and record the result of the inventory in the Direct Bet Coupon ledger. The procedures to be utilized to inventory the Coupons shall be submitted for approval as part of the certificate holder's internal controls.

(l) When unused and expired Direct Bet Coupons are returned to the finance department, a finance department supervisor shall record the following information in the Direct Bet Coupon ledger:

(1) The date the coupons were returned.

(2) The beginning and ending serial numbers of the coupons returned.

(3) The denomination and quantity of coupons returned.

(4) The serial numbers of any coupons that were voided and the reason the coupons were voided.

(5) The name, signature and Board-issued credential number of the marketing department supervisor returning the unused coupons and the name, signature and Board-issued credential number of the finance department supervisor who received the unused coupons.

(m) A certificate holder may internally manufacture or print Direct Bet Coupons provided that internal controls governing the production and subsequent reconciliation of the coupons are submitted and approved by the Board.

(n) If included in the certificate holder's internal controls, required under § 465a.2 (relating to internal control systems and audit protocols), a certificate holder may

authorize a gaming service provider to print and mail Direct Bet Coupons directly to patrons in accordance with the following requirements:

(1) The Direct Bet Coupons mailed by the gaming service provider must comply with subsections (c) and (d).

(2) The certificate holder shall supply the gaming service provider, through electronic means, a list of the following information for each patron to whom the Direct Bet Coupon shall be mailed:

(i) The patron's name.

(ii) The patron's address.

(iii) The denomination of the Direct Bet Coupon.

(iv) The expiration date of the Direct Bet Coupon.

(v) A serial number on each Direct Bet Coupon.

(3) The Direct Bet Coupon issued must include a means such as magnetic strip, bar code, or QR code that will enable the certificate holder's computer system to identify the information required under subsection (n)(2).

(4) The information in subsection (n)(2) shall be provided to the finance department which shall maintain the information for purposes of inventory and reconciliation as required under subsections (f) and (g).

(5) Direct Bet Coupons issued must be electronically canceled in the certificate holder's computer system immediately upon redemption or during the counting

of the table game drop boxes as provided in § 465a.25 (relating to counting and recording of slot cash storage boxes and table game drop boxes).

(6) The certificate holder is responsible for ensuring that the gaming service provider does not mail Direct Bet Coupons to individuals on the casino self-exclusion list under Chapter 503a (relating to casino self-exclusion) or the exclusion list under Chapter 511a (relating to persons required to be excluded).

(o) A certificate holder may utilize a computerized system that complies with the requirements in this section provided that:

(1) The computerized system creates Direct Bet Coupons that comply with the requirements in subsection (d).

(2) The computerized system provides an equivalent audit trail and allows for the segregation of duties to satisfy the requirements in this section.

(3) The certificate holder includes in its internal controls required under § 465a.2 procedures governing the production, recording and reconciliation of the computer generated Direct Bet Coupons.

**§ 603a.23. Direct Bet Coupon use.**

(a) A Direct Bet Coupon may be redeemed only at a gaming table in which patrons wager against the house.

(b) A Direct Bet Coupon shall be verified as being valid by a dealer or boxperson prior to being accepted as a wager.

(c) Direct Bet Coupons must be electronically canceled in the casino management system upon redemption.

(d) Only one Direct Bet Coupon may be used per patron per round of play.

(e) Direct Bet Coupons may be utilized on main wagers that have payout odds of 1 to 1. Examples of acceptable wagers include:

(1) In Roulette wagers on “Red” “Black” “Odd” “Even” “1-18” or “19-36”

(2) In Pai Gow, on the main Pai Gow wager

(3) In Craps or Minicraps on the “Pass” or “Don’t Pass”

(4) In Baccarat, Minibaccarat, Midibaccarat, or other Baccarat variation, on the “Player” or “Dealer”

(5) In Blackjack, Spanish 21, or other Blackjack variations, on the main Blackjack wager

(f) Whether the wager wins or loses, the dealer shall deposit the Direct Bet Coupon into the drop box attached to the gaming table at the time the winning wager is paid or the losing wager is collected. If the wager is a push, the Direct Bet Coupon shall remain in play for the next round.



**SUBPART L. INTERACTIVE GAMING**

**CHAPTER 819a. INTERACTIVE GAMING PROGRESSIVES**

**§ 819a.1 Interactive Gaming Progressives.**

**(a) An interactive gaming certificate holder, or interactive gaming operator licensee operating on behalf of an interactive gaming certificate holder, may offer progressive jackpots that:**

**(1) increase in value based upon an approved rate of progression, and**

**(2) are awarded for a specific outcome or event.**

**(b) An interactive gaming progressive must include:**

**(1) The rules governing the award of the progressive readily available to players.**

**(2) A progressive meter, visible to the players, which must increase in value based upon wagers placed, and that advises players of the amount which can be won if the player receives the corresponding outcome.**

**(3) A cumulative progressive payout meter that continuously and automatically records the total value of progressive jackpots paid to winning players.**

**(c) An interactive gaming progressive may not be offered for play until the following have been submitted to the Bureau of Gaming Laboratory Operations for review and approval, in accordance with §461a.4 (relating to submission for testing and approval):**

**(1) The progressive software, including a mechanism to authenticate and review the software;**

(2) The rules governing the progressive, including how they will be displayed to players;

(3) The initial seed and reseed amounts at which the progressive meter will be set;

(4) The proposed rate of progression for each progressive jackpot;

(5) The proposed incrementation rate for a reserve pool, if any, to fund the next reset amount;

(d) A modification to an interactive gaming progressive may not be offered for play until a written explanation of the modification has been submitted to the Bureau of Gaming Laboratory Operations for review and approval granted, in accordance with §461a.4 (relating to submission for testing and approval)

(e) Two or more linked games offering the same progressive jackpot may be of different denominations or have different wagers, or both, required to win the progressive jackpot, provided that:

(1) The probability of winning the progressive jackpot is directly proportional to the wager required to win that jackpot.

(2) Notice indicating the proportional probability of hitting the interactive gaming progressive jackpot is conspicuously displayed.

(f) Prior to an interactive gaming progressive being offered, the operator shall be required to update its internal controls.

(1) The internal controls shall provide the procedures by which jackpots are reconciled.

(2) The internal controls shall provide for the procedures for investigating and reporting variances.

(g) In the event of a malfunction, the interactive gaming progressive shall be made unavailable to players.

(1) The operator shall notify the Board in writing within 24 hours of a malfunction.

(2) The operator shall investigate the cause of the malfunction and provide updates to the Board.

(3) The operator shall not make the progressive available to players again until Board approval of corrective action has been granted.

(h) Interactive gaming progressive jackpot meters may not be turned back to a lesser amount unless one of the following occurs:

(1) The amount indicated has been actually paid to a winning patron and the interactive gaming progressive jackpot amount has been recorded in accordance with the internal controls approved by the Board.

(2) With written approval, the interactive gaming progressive jackpot has been transferred to another interactive gaming progressive or interactive gaming wide area progressive system.

(3) The change is necessitated by a malfunction. An explanation shall be provided, and the Board consulted prior to the adjustment being made.

(i) An interactive gaming progressive may be transferred or terminated after written notice has been provided to the Board subject to the following:

(1) Players shall be given at least 30 days' notice, in a manner approved by the Board, prior to an interactive gaming progressive being terminated or transferred.

(2) The transfer is to another Board approved interactive gaming progressive, and the Board has verified and approved the comparability of the two interactive gaming progressives.

(3) The transfer represents the entire interactive gaming progressive pot.

(4) An interactive gaming progressive may be terminated concurrent with the winning of the progressive jackpot, provided that the progressive was so configured prior to the winning of the jackpot.

#### § 819a.2 Interactive Gaming Wide Area Progressives.

(a) Two or more interactive gaming certificate holders and/or interactive gaming operator licensees may, with the prior written approval of the Board, operate an interactive gaming wide area progressive system.

(b) An interactive gaming wide area progressive system shall at all times be operated in accordance with the relevant requirements of the Act and the Board's regulations, including §819a.1 Interactive Gaming Progressives.

(c) An interactive gaming wide area progressive system shall be operated and administered by participating certificate holders and licensees in accordance with the terms and conditions of a written agreement executed by the participating certificate holders and licensees. The agreement, to be referred to as an interactive gaming wide area progressive agreement, must be submitted in writing and approved by the Board prior to implementation.

(1) The interactive gaming wide area progressive agreement shall include terms covering the operation and administration of the interactive gaming wide area progressive system.

(2) The interactive gaming wide area progressive agreement shall identify and describe with specificity the duties, responsibilities, and authority of each participating certificate holder and/or licensee.

(3) The interactive gaming wide area progressive agreement shall outline the responsibilities for funding and payment of all jackpots, fees and taxes associated with the operation of the interactive gaming wide area progressive system.

(4) The interactive gaming wide area progressive agreement shall detail the process by which significant decisions with regard to the operation of the interactive gaming wide area progressive system are approved and implemented by the participating certificate holders and/or licensees.

(5) The interactive gaming wide area progressive agreement shall outline the responsibilities for maintaining records and notifying the Board.

(d) All certificate holders and licensees party to an interactive gaming wide area progressive agreement will be required to update internal controls prior to commencing interactive gaming wide area progressive operations.

(e) An interactive gaming wide area progressive may only be transferred to another game that is available on all interactive gaming wide area progressive agreement participants' sites. Any transfer must include the entirety of the progressive jackpot pool, including all seed/reseed amounts collected.

**(f) Each party to an interactive gaming wide area progressive agreement shall be liable for acts, omissions and violations of the act and this part related to its own individual duties and responsibilities under the slot system agreement, unless the slot system agreement specifically provides that the parties will be jointly and severally liable.**

**Annex B**  
**TITLE 58. RECREATION**  
**PART VII. GAMING CONTROL BOARD**  
**SUBPART K. TABLE GAMES**

**CHAPTER 633a. BLACKJACK**

**§ 633a.13. Payout odds; payout limitations.**

\*\*\*\*\*

(k) The certificate holder shall pay out winning Three Card Poker Wagers at odds in [one of] the following pay table [tables] selected by the certificate holder in its Rules

Submission filed in accordance with § 601a.2:

<i>Hand</i>	<i>[Paytable A]</i>	<i>Paytable [B]</i>
Straight Flush	[9 to 1]	30 to 1
Three-of-a-kind	[9 to 1]	20 to 1
Straight	[9 to 1]	10 to 1
Flush	[9 to 1]	5 to 1

(l) If the certificate holder offers the Hit and Run Progressive Wager:

\*\*\*\*\*

**CHAPTER 687a. DJ WILD STUD POKER**

**§ 687a.11. Procedures for completion of each round of play.**

\*\*\*\*\*

(f) After settling the player's Ante Wager, Blind Wager and Raise Wager, the dealer shall settle any optional wagers as follows:

(1) For the Progressive Bonus Wager, if the player has been dealt the Joker Wild card, it will be replaced in his hand with the one card in the area on the layout described in § 687a.2(b)(4) (relating to DJ Wild Stud Poker Table; physical characteristics).

(i) If the player's highest ranking DJ Wild Stud Poker hand is not three-of-a-kind or better, as provided in § 687a.6(d), the dealer shall collect the losing Progressive Bonus Wager.

(ii) If the player's highest ranking DJ Wild Stud Poker hand is three-of-a-kind or better, as provided in § 687a.6(d), the dealer shall pay the winning Progressive Bonus Wager in accordance with § 687a.12(c).

(2) For the Trips Bonus Wager:

(i) If the player's highest ranking DJ Wild Stud Poker hand is not three-of-a-kind or better, as provided in § 687a.6(e), the dealer shall collect the losing Trips Bonus Wager.

(ii) If the player's highest ranking DJ Wild Stud Poker hand is three-of-a-kind or better, as provided in § 687a.6(e), the dealer shall pay the winning Trips Bonus Wager in accordance with § 687a.12(d).

(3) For the Two-Way Bad Beat Bonus Wager:

(i) If the player's highest ranking DJ Wild Stud Poker hand **and the dealers highest ranking DJ Wild Stud Poker hand are** [is] not **both** three-of-a-kind or better, or the player's **and dealer's** highest ranking hands **tie being** [is] a three-of-a-kind or better [**but does not lose to the dealer's higher ranking hand,**] as provided in § 687a.6(f), the dealer shall collect the losing Two-Way Bad Beat Bonus Wager.

(ii) If the player's highest ranking DJ Wild Stud Poker hand is three-of-a-kind or better and loses to the dealer's higher ranking hand, as provided in § 687a.6(f), the dealer shall pay the winning Two-Way Bad Beat Bonus Wager in accordance with § 687a.12(e).



**(iii) If the dealer’s highest ranking DJ Wild Stud Poker hand is three-of-a-kind or better and loses to the players highest ranking hand, as provided in § 687a.6(f), the dealer shall pay the winning Two-Way Bad Beat Bonus Wager in accordance with § 687a. 12(e).**

(g) After all wagers of the player have been settled, the dealer shall remove any remaining cards from the table and place them in the discard rack in a manner that permits the reconstruction of each hand in the event of a question or dispute.

\*\*\*\*\*

**§ 687a.12. Payout odds; progressive wager configuration.**

\*\*\*\*\*

(c) A certificate holder shall pay out winning Progressive Bonus Wagers in accordance with one of the following payout tables selected by the certificate holder in its Rules Submission filed in accordance with § 601a.2 (relating to table games Rules Submission):

<i>Progressive Paytable 1; \$1 Wager; [\$2,000] \$10,000 seed and re-seed</i>		
Hand	Pay	Envy
Royal flush	100% of meter	\$1,000
Straight flush	10% of meter	\$300
Four-of-a-kind	300 to 1	
Full house	50 to 1	
Flush	40 to 1	
Straight	30 to 1	
Three-of-a-kind	9 to 1	

<i>Progressive Paytable 2; \$5 wager; \$10,000 seed and re-seed</i>		
Hand	Pay	Envy
Royal flush	100% of meter	\$5,000
Straight flush	10% of meter	\$1,500

Four-of-a-kind	300 to 1	
Full house	50 to 1	
Flush	40 to 1	
Straight	30 to 1	
Three-of-a-kind	9 to 1	

(d) A certificate holder shall pay out winning Trips Bonus Wager as provided in one of the following payout tables selected by the certificate holder in its Rules Submission filed in accordance with § 601a.2:

\*\*\*\*\*

## **SUBPART L. INTERACTIVE GAMING**

### **CHAPTER 812a. INTERACTIVE GAMING PLAYER ACCOUNTS**

#### **§ 812a.9. Player Account Controls.**

\*\*\*\*\*

(c) Interactive gaming systems must employ a mechanism that detects session inactivity and terminates a player session when applicable.

(1) If the interactive gaming system fails to receive a response from the interactive gaming device within **[30] 15** minutes, whether the player has been in away from computer mode or not, the interactive gaming system must implement a user inactivity timeout and terminate the player session.

(2) If a player session is terminated due to player inactivity timeout, the interactive gaming device must display to the player the player session termination (that is, the user inactivity timeout) upon the player's next attempted action on the interactive gaming system.

(3) Further game play is not permitted until the interactive gaming system and the interactive gaming device establish a new session.

(d) A player session ends when:

\*\*\*\*\*



PENNSYLVANIA GAMING CONTROL BOARD  
303 Walnut Street  
Commonwealth Tower, 5<sup>th</sup> Floor  
Harrisburg, PA 17101  
[www.gamingcontrolboard.pa.gov](http://www.gamingcontrolboard.pa.gov)

ROBERT WOOD  
*Assistant Chief Counsel*  
303 Walnut Street  
Commonwealth Tower, 5<sup>th</sup> Floor  
Harrisburg, PA 17101  
Phone: (717) 346-8300  
Fax: (717) 346-8350  
Email: [rmwood@pa.gov](mailto:rmwood@pa.gov)

March 20, 2024

*Chair*  
DENISE J. SMYLER

*Commissioners*  
FRANK DERMODY  
SHAWN DILLON  
DAVID S. HICKERNELL  
SARA MANZANO-DÍAZ  
NEDIA RALSTON  
FRANCES J. REGAN

*Ex-Officio Members*  
PAT BROWNE  
STACY GARRITY  
RUSSELL C. REDDING

Delivered via e-mail

David Sumner, Executive Director  
Independent Regulatory Review Commission  
333 West Market Street, 14th Floor  
Harrisburg, PA 17120

RE: PGCB Proposed Rulemaking #125-247: Direct Bet Coupons, Interactive Gaming Progressives, and Miscellaneous Corrections

Dear Mr. Sumner:

Enclosed with this letter please find a copy of a proposed rulemaking for review by the Independent Regulatory Review Commission (“Commission”) from the Pennsylvania Gaming Control Board (“Board”). This proposed rulemaking sets forth the regulatory framework for the issuance and use of Direct Bet Coupons and a regulatory framework for Interactive Gaming Progressive wagers and systems. Additionally, this proposed rulemaking makes edits under Interactive Gaming Account Controls to correct an inconsistency in timeout periods. Finally, this rulemaking proposes edits to certain table games rules. This proposed rulemaking was adopted by the Board on January 24, 2024, and was approved for form and legality by the Attorney General’s Office on March 13, 2024.

This proposed rulemaking was e-Delivered to the Majority Chair and Minority Chair of the House Gaming Oversight Committee, the Majority Chair and Minority Chair of the Senate Community, Economic and Recreational Development Committee, the Legislative Reference Bureau, and the Governor’s Budget Office for the issuance of a fiscal note. Confirmation of the deliveries to the Committees and the Legislative Reference Bureau is contained in the proposed rulemaking packet.

Sincerely,

Robert Wood  
Assistant Chief Counsel

Enclosure

RECEIVED

**From:** [Jennifer Weeter](#)  
**To:** [Wood, Robert \(PGCB\)](#)  
**Subject:** RE: [EXTERNAL]: FW: Electronic Delivery of PGCB Proposed Rulemaking 125-247  
**Date:** Wednesday, March 20, 2024 12:48:01 PM

Independent Regulatory  
Review Commission  
March 20, 2024

Received. Thank you. I haven't been in my office much of the morning and not looking at my email on phone.

jen

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**From:** Wood, Robert (PGCB) <rmwood@pa.gov>  
**Sent:** Wednesday, March 20, 2024 12:47 PM  
**To:** Hank Beaver (PA House Majority (D <HBeaver@pahouse.net>; Jennifer Weeter <jweeter@pahousegop.com>; Jerome "Al" Taylor <Jerome.Taylor@pasenate.com>  
**Subject:** [EXTERNAL]: FW: Electronic Delivery of PGCB Proposed Rulemaking 125-247  
**Importance:** High

I realized I forgot to flag the initial email as high importance, and wanted to make sure that it stands out in your email inbox.

Robert Wood, Esq.  
Assistant Chief Counsel  
Pennsylvania Gaming Control Board  
Phone: (717) 317-5744

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**From:** Wood, Robert (PGCB)  
**Sent:** Wednesday, March 20, 2024 8:29 AM  
**To:** Derek Clepper (PA Sen Maj (R)) <dclepper@pasen.gov>; Hank Beaver (PA House Majority (D)) <HBeaver@pahouse.net>; Jen Weeter (PA House Minority (R)) <jweeter@pahousegop.com>; Jerome "Al" Taylor <Jerome.Taylor@pasenate.com>  
**Cc:** Posavec, Cheryl (PGCB) <cposavec@pa.gov>  
**Subject:** Electronic Delivery of PGCB Proposed Rulemaking 125-247

Good Morning,

Enclosed are the documents related to PGCB Proposed Rulemaking 125-247, which provides for Direct Bet Coupons and Interactive Gaming Progressives, and provides revisions under Interactive Gaming Account Controls and Table Games rules. Attached are the following items:

RECEIVED

Independent Regulatory  
Review Commission

March 20, 2024

1. Regulatory Analysis Form (PDF)
2. Face Sheet (PDF Format)
3. Preamble (PDF)
4. Annexes A and B text (PDF)

**Please reply to this email confirming receipt of the materials on behalf of the Committee Chairs.** A confirmatory email is required in order to be able to document delivery for IRRC . Thank you, and please let me know if you need anything else from the PGCB.

Robert Wood, Esq.  
Assistant Chief Counsel  
Pennsylvania Gaming Control Board  
Phone: (717) 317-5744

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**From:** [Clepper, Derek](#)  
**To:** [Wood, Robert \(PGCB\)](#)  
**Subject:** RE: Electronic Delivery of PGCB Proposed Rulemaking 125-247  
**Date:** Wednesday, March 20, 2024 9:06:16 AM

Independent Regulatory  
Review Commission  
March 20, 2024

Good Morning,

On behalf of Senator Chris Gebhard, Chairman of Senate Community, Economic & Recreational Development Committee, I have received the documents attached to this email:

1. Regulatory Analysis Form (PDF),
2. Face Sheet (PDF Format),
3. Preamble (PDF),
4. Annexes A and B text (PDF).

Derek Clepper

**Derek R. Clepper, Esq.**

Counsel/Executive Director  
Senate Community, Economic & Recreational Development  
Senator Chris Gebhard  
15 East Wing Capitol Building  
Harrisburg, PA 17120  
Phone: 717-787-5708  
[dclepper@pasen.gov](mailto:dclepper@pasen.gov)

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**From:** Wood, Robert (PGCB) <rmwood@pa.gov>  
**Sent:** Wednesday, March 20, 2024 8:29 AM  
**To:** Clepper, Derek <dclepper@pasen.gov>; Hank Beaver (PA House Majority (D)) <HBeaver@pahouse.net>; Jen Weeter (PA House Minority (R)) <jweeter@pahousegop.com>; Jerome "Al" Taylor <Jerome.Taylor@pasenate.com>  
**Cc:** Posavec, Cheryl (PGCB) <cposavec@pa.gov>  
**Subject:** Electronic Delivery of PGCB Proposed Rulemaking 125-247

Ⓞ CAUTION : External Email Ⓞ

Good Morning,

Enclosed are the documents related to PGCB Proposed Rulemaking 125-247, which provides for Direct Bet Coupons and Interactive Gaming Progressives, and provides revisions under Interactive Gaming Account Controls and Table Games rules. Attached are the following items:

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Robert Wood, Esq.  
Assistant Chief Counsel  
Pennsylvania Gaming Control Board  
Phone: (717) 317-5744

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**From:** [Taylor, Jerome](#)  
**To:** [Wood, Robert \(PGCB\)](#); [Beaver, Hank](#); [Jennifer Weeter](#)  
**Subject:** RE: Electronic Delivery of PGCB Proposed Rulemaking 125-247  
**Date:** Wednesday, March 20, 2024 2:34:24 PM

Independent Regulatory  
Review Commission  
March 20, 2024

---

This is to confirm receipt of the documents related to PGCB Proposed Rulemaking 125-247.

Thanks

*Jerome "Al" Taylor*

Legislative Director

State Senator Anthony H. Williams

11 East Wing, Capitol Building | Harrisburg, PA 17021

Ph. 717-787-5970 | Fax 717-772-0574

Email: [Jerome.Taylor@pasenate.com](mailto:Jerome.Taylor@pasenate.com)

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**Sent:** Wednesday, March 20, 2024 12:47 PM

**To:** Hank Beaver (PA House Majority (D <HBeaver@pahouse.net>; Jen Weeter (PA House Minority (R <jweeter@pahousegop.com>; Taylor, Jerome <Jerome.Taylor@pasenate.com>

**Subject:** FW: Electronic Delivery of PGCB Proposed Rulemaking 125-247

**Importance:** High

**EXTERNAL EMAIL**

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I realized I forgot to flag the initial email as high importance, and wanted to make sure that it stands out in your email inbox.

Robert Wood, Esq.

Assistant Chief Counsel

Pennsylvania Gaming Control Board

Phone: (717) 317-5744

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**Cc:** Posavec, Cheryl (PGCB) <[cposavec@pa.gov](mailto:cposavec@pa.gov)>  
**Subject:** Electronic Delivery of PGCB Proposed Rulemaking 125-247

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Review Commission  
March 20, 2024

**Please reply to this email confirming receipt of the materials on behalf of the Committee Chairs.** A confirmatory email is required in order to be able to document delivery for IRRC . Thank you, and please let me know if you need anything else from the PGCB.

Robert Wood, Esq.  
Assistant Chief Counsel  
Pennsylvania Gaming Control Board  
Phone: (717) 317-5744

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**From:** [Bulletin](#)  
**To:** [Wood, Robert \(PGCB\)](#)  
**Cc:** [Posavec, Cheryl \(PGCB\)](#); [Adeline E. Gaydosh](#); [A.J. Mendelsohn](#)  
**Subject:** [External] Re: e-Delivery of PGCB Proposed Rulemaking 125-247  
**Date:** Wednesday, March 20, 2024 9:33:41 AM

Independent Regulatory  
Review Commission  
March 20, 2024

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**ATTENTION:** *This email message is from an external sender. Do not open links or attachments from unknown senders. To report suspicious email, use the [Report Phishing button in Outlook](#).*

Good morning, Robert,

Thank you for sending this proposed rulemaking for publication. Upon receipt of the fiscal note, I'll schedule it for publication.

Have a wonderful day!

Adeline

**Adeline Gaydosh | Legal Assistant**

[agaydosh@palrb.us](mailto:agaydosh@palrb.us) | 717.783.3984

Legislative Reference Bureau

*Pennsylvania Code & Bulletin Office*

647 Main Capitol Building

Harrisburg, PA 17120

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**From:** Wood, Robert (PGCB) <rmwood@pa.gov>  
**Sent:** Wednesday, March 20, 2024 8:28 AM  
**To:** Bulletin <bulletin@palrb.us>; A.J. Mendelsohn <amendelsohn@palrb.us>; Adeline E. Gaydosh <agaydosh@palrb.us>  
**Cc:** Posavec, Cheryl (PGCB) <cposavec@pa.gov>  
**Subject:** e-Delivery of PGCB Proposed Rulemaking 125-247

Good Morning:

This email serves as electronic delivery of Proposed Rulemaking #125-247 from the Pennsylvania Gaming Control Board, relating to Direct Bet Coupons and Interactive Gaming Progressives, and edits under Interactive Gaming Account Controls and Table Games Rules. Attached to this email are the following documents:

1. Regulatory Analysis Form (PDF Format)
2. Face Sheet (PDF Format)
3. Preamble (Word and PDF Format)
4. Annex A and Annex B text (Word and PDF format)

Please reply to this email confirming receipt of the materials on behalf of the Legislative Reference Bureau. These documents are also being sent to the GBO for the issuance of a Fiscal Note, and the Committee Chairs. Once delivery is confirmed they will be delivered to

IRRC. Thank you, and please let me know if you need anything else from the PGCB.

Robert Wood, Esq.  
Assistant Chief Counsel  
Pennsylvania Gaming Control Board  
Phone: (717) 317-5744

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March 20, 2024

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**From:** [Beaver, Hank III](#)  
**To:** [Wood, Robert \(PGCB\)](#)  
**Subject:** RE: Electronic Delivery of PGCB Proposed Rulemaking 125-247  
**Date:** Wednesday, March 20, 2024 2:08:36 PM

Independent Regulatory  
Review Commission  
March 20, 2024

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Received. Thanks Robert!

Sincerely,

**Hank Beaver**

Executive Director  
House Gaming Oversight Committee  
Rep. Pat Harkins, Majority Chairman  
328 Irvis Office Building  
Harrisburg, PA 17120  
Desk: 717-772-5404  
Mobile: 717-810-7677

---

**From:** Wood, Robert (PGCB) <rmwood@pa.gov>  
**Sent:** Wednesday, March 20, 2024 12:47 PM  
**To:** Beaver, Hank III <HBeaver@pahouse.net>; Jen Weeter (PA House Minority (R) <jweeter@pahousegop.com>; Jerome "Al" Taylor <Jerome.Taylor@pasenate.com>  
**Subject:** FW: Electronic Delivery of PGCB Proposed Rulemaking 125-247  
**Importance:** High

I realized I forgot to flag the initial email as high importance, and wanted to make sure that it stands out in your email inbox.

Robert Wood, Esq.  
Assistant Chief Counsel  
Pennsylvania Gaming Control Board  
Phone: (717) 317-5744

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**From:** Wood, Robert (PGCB)  
**Sent:** Wednesday, March 20, 2024 8:29 AM  
**To:** Derek Clepper (PA Sen Maj (R)) <dclepper@pasen.gov>; Hank Beaver (PA House Majority (D)) <HBeaver@pahouse.net>; Jen Weeter (PA House Minority (R)) <jweeter@pahousegop.com>; Jerome "Al" Taylor <Jerome.Taylor@pasenate.com>

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**Cc:** Posavec, Cheryl (PGCB) <[cposavec@pa.gov](mailto:cposavec@pa.gov)>

**Subject:** Electronic Delivery of PGCB Proposed Rulemaking 125-247

Independent Regulatory  
Review Commission

March 20, 2024

Good Morning,

Enclosed are the documents related to PGCB Proposed Rulemaking 125-247, which provides for Direct Bet Coupons and Interactive Gaming Progressives, and provides revisions under Interactive Gaming Account Controls and Table Games rules. Attached are the following items:

1. Regulatory Analysis Form (PDF)
2. Face Sheet (PDF Format)
3. Preamble (PDF)
4. Annexes A and B text (PDF)

**Please reply to this email confirming receipt of the materials on behalf of the Committee Chairs.** A confirmatory email is required in order to be able to document delivery for IRRC . Thank you, and please let me know if you need anything else from the PGCB.

Robert Wood, Esq.  
Assistant Chief Counsel  
Pennsylvania Gaming Control Board  
Phone: (717) 317-5744

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**From:** [Elliott, Amy M.](#)  
**To:** [Wood, Robert \(PGCB\)](#)  
**Cc:** [Trotter, Carolyn](#); [Posavec, Cheryl \(PGCB\)](#)  
**Subject:** RE: [ EXTERNAL ] PGCB Proposed Rulemaking 125-247  
**Date:** Wednesday, March 13, 2024 12:14:56 PM  
**Attachments:** [PGCB req#125-247 Face Sheet Signed 1.24.24.pdf](#)

Independent Regulatory  
Review Commission

March 20, 2024

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Good afternoon Robert,

PGCB regulation #125-247, as amended, is approved for form and legality only. A signed Face Sheet is attached.

Thanks, Amy

Amy M. Elliott  
Chief Deputy Attorney General  
Legal Review Section  
717-783-6316 (w)  
717-941-0523 (c)  
[aelliott@attorneygeneral.gov](mailto:aelliott@attorneygeneral.gov)

---

**From:** Wood, Robert (PGCB) <[rmwood@pa.gov](mailto:rmwood@pa.gov)>  
**Sent:** Monday, March 11, 2024 9:00 AM  
**To:** Elliott, Amy M. <[aelliott@attorneygeneral.gov](mailto:aelliott@attorneygeneral.gov)>  
**Cc:** Trotter, Carolyn <[ctrotter@attorneygeneral.gov](mailto:ctrotter@attorneygeneral.gov)>; Posavec, Cheryl (PGCB) <[cposavec@pa.gov](mailto:cposavec@pa.gov)>  
**Subject:** RE: [ EXTERNAL ] PGCB Proposed Rulemaking 125-247

Good Morning Amy,

Attached are revisions and explanations based upon your Tolling Memo and comments for PGCB Proposed Regulation package 125-247. I have attached the revised documents in a redlined/track changes form to flag the edits and further clarifications for your review. Please let me know if you have any questions.

Robert Wood, Esq.  
Assistant Chief Counsel  
Pennsylvania Gaming Control Board  
Phone: (717) 317-5744

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**TRANSMITTAL SHEET FOR REGULATIONS SUBJECT TO THE  
REGULATORY REVIEW ACT**

**I.D. NUMBER:** 125-247

**SUBJECT:** Direct Bet Coupons, Interactive Gaming Progressives, and Modifications to Interactive Gaming Account Controls and Table Games Rules

**AGENCY:** Pennsylvania Gaming Control Board

**TYPE OF REGULATION**

- Proposed Regulation**
- Final Regulation**
- Final Regulation with Notice of Proposed Rulemaking Omitted**
- 120-day Emergency Certification of the Attorney General**
- 120-day Emergency Certification of the Governor**
- Delivery of Tolled Regulation**
  - With Revisions**
  - Without Revisions**

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Independent Regulatory  
Review Commission

March 20, 2024

**FILING OF REGULATION**

**DATE**

**SIGNATURE**

**DESIGNATION**

**HOUSE COMMITTEE -**

3/20/24



**MAJORITY CHAIR** Rep. Patrick J. Harkins, via e-delivery

3/20/24



**MINORITY CHAIR** Rep. Russ Diamond, via e-delivery

**SENATE COMMITTEE -**

3/20/24



**MAJORITY CHAIR** Sen. Chris Gebhard, via e-delivery

3/20/24



**MINORITY CHAIR** Sen. Anthony H. Williams, via e-delivery

3/20/24



**INDEPENDENT REGULATORY REVIEW COMMISSION**

David Sumner, via e-delivery

**ATTORNEY GENERAL (for Final Omitted only)**

3/20/24



**LEGISLATIVE REFERENCE BUREAU (for Proposed only)**  
via e-delivery