



Common Sense Initiative

Mike DeWine, Governor
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Business Impact Analysis

Agency, Board, or Commission Name: Ohio Casino Control Commission
("Commission")

Rule Contact Name and Contact Information:

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Regulation/Package Title (a general description of the rules' substantive content):

OCCC 2021 5YR Batch 3 (Ohio Adm.Code Chapters 3772-22 (Disciplinary Actions) and 3772-23 (Involuntary Exclusion))

Rule Number(s): 3772-22-01, 3772-23-01, 3772-23-06

Date of Submission for CSI Review: 5/19/2021

Public Comment Period End Date: 6/2/2021

Rule Type/Number of Rules:

New/1 rule

No Change/___ rules (FYR? ___)

Amended/1 rule (FYR? Yes)

Rescinded/1 rules (FYR? Yes)

The Common Sense Initiative is established in R.C. 107.61 to eliminate excessive and duplicative rules and regulations that stand in the way of job creation. Under the Common Sense Initiative, agencies must balance the critical objectives of regulations that have an adverse impact on business with the costs of compliance by the regulated parties. Agencies should promote transparency, responsiveness, predictability, and flexibility while developing

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regulations that are fair and easy to follow. Agencies should prioritize compliance over punishment, and to that end, should utilize plain language in the development of regulations.

Reason for Submission

1. R.C. 106.03 and 106.031 require agencies, when reviewing a rule, to determine whether the rule has an adverse impact on businesses as defined by R.C. 107.52. If the agency determines that it does, it must complete a business impact analysis and submit the rule for CSI review.

Which adverse impact(s) to businesses has the agency determined the rule(s) create?

The rule(s):

- a. ☐ Requires a license, permit, or any other prior authorization to engage in or operate a line of business.
- b. ☒ Imposes a criminal penalty, a civil penalty, or another sanction, or creates a cause of action for failure to comply with its terms.
- c. ☒ Requires specific expenditures or the report of information as a condition of compliance.
- d. ☐ Is likely to directly reduce the revenue or increase the expenses of the lines of business to which it will apply or applies.

Regulatory Intent

2. Please briefly describe the draft regulation in plain language.

Please include the key provisions of the regulation as well as any proposed amendments.

- **3772-22-01 (amendment)**, titled “Sanctions.” This rule permits the Commission to discipline any licensee or applicant for specific actions. The rule further provides that the Commission may impose any discipline set forth in R.C. Chapter 3772 and lists the criteria that the Commission may take into effect in considering punishment. The purpose of the rule is to permit the Commission to effectively regulate the integrity of casino gaming by ensuring that those who violate R.C. Chapter 3772 or the rules adopted thereunder are held accountable. Additionally, this rule is required by R.C. 3772.03(D)(23). The amendments to this rule are simply to improve readability and clarity.
- **3772-23-01 (new)**, titled “Involuntary exclusion list.” This rule, while new, is comprised of current Ohio Adm.Code Chapter 3772-23, which is being completely rescinded and combined into this one rule. The rule contains those provisions from current Ohio Adm.Code Chapter 3772-23 that were not already spelled out in the Revised Code or other provisions of the Administrative Code. This includes provisions describing the involuntary

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exclusion list, explicit statements both that individuals on the list cannot enter casino facilities and that operators must exclude individuals on the list from entering their facility, and requiring that operators notify the Commission's gaming agents should a person on the list be discovered on site. The purpose of this rule is to refine involuntary exclusion list requirements not covered elsewhere in the Revised Code. Additionally, this rule is required by R.C. 3772.031.

- **3772-23-06 (rescind)**, titled "Casino operator duties." This rule established the responsibilities of casino operators with regards to the involuntary exclusion list, including requiring operators to adopt internal controls and train their employees on the involuntary exclusion list. The rule is being rescinded since it is duplicative of other provisions in the Revised and Administrative Codes. However, the requirements that an operator exclude individuals on the list and notify Commission gaming agents if a person on the list is found in the facility will continue on in new Ohio Adm.Code 3772-23-01(C) and (D).

3. Please list the Ohio statute(s) that authorize the agency, board or commission to adopt the rule(s) and the statute(s) that amplify that authority.

R.C. Chapter 119 and sections 3772.03, 3772.031, 3772.033, and 3772.04.

4. Does the regulation implement a federal requirement? Is the proposed regulation being adopted or amended to enable the state to obtain or maintain approval to administer and enforce a federal law or to participate in a federal program?

If yes, please briefly explain the source and substance of the federal requirement.

Not Applicable.

5. If the regulation includes provisions not specifically required by the federal government, please explain the rationale for exceeding the federal requirement.

This question is not applicable to these amendments because the federal government does not regulate casino gaming in this state or in general. Rather, casino gaming is permitted pursuant to Article XV, Section 6(C) of the Ohio Constitution and is controlled by Ohio's Casino Control Act (i.e., R.C. Chapter 3772).

6. What is the public purpose for this regulation (i.e., why does the Agency feel that there needs to be any regulation in this area at all)?

Article XV, Section 6(C) of the Ohio Constitution and R.C. Chapter 3772 require the Commission to ensure the integrity of casino gaming and to prescribe rules for how casino gaming should be conducted, including rules on disciplinary actions (R.C. 3772.03(D)(23) and 3772.04) and involuntary exclusion (R.C. 3772.031). These rules are designed to effectuate this constitutional and statutory mandate.

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7. How will the Agency measure the success of this regulation in terms of outputs and/or outcomes?

Overall, the Commission will measure the success of the amendments in terms of whether they help to ensure the integrity of casino gaming while recognizing the practical concerns casino operators face. This can be done in two ways: first, through evaluating whether the administrative cost of implementing and enforcing the proposed amendments outweighs their public benefit, and second, through analyzing the regulated community's comments about requests for amendments to the rules or for waivers or variances from the rules. No such requests or comments have been received on these rules during their review period or in the informal comment opportunities that preceded this filing.

8. Are any of the proposed rules contained in this rule package being submitted pursuant to R.C. 101.352, 101.353, 106.032, 121.93, or 121.931?

If yes, please specify the rule number(s), the specific R.C. section requiring this submission, and a detailed explanation.

No.

Development of the Regulation

9. Please list the stakeholders included by the Agency in the development or initial review of the draft regulation.

If applicable, please include the date and medium by which the stakeholders were initially contacted.

In reviewing these rules, an email was sent on April 19 to over 100 stakeholders. (Exhibits 1 and 2). Stakeholders were asked to submit any written comments on the rule by 5:00 p.m. on April 30, 2021. (Exhibit 1.) These stakeholders included employees or representatives from casino operators, management companies, holding companies, gaming-related vendors, and independent testing laboratories. No written comments from stakeholders were received. Finally, stakeholders had the opportunity to comment during the Commission's public meeting on May 19, 2021. No comments were made.

10. What input was provided by the stakeholders, and how did that input affect the draft regulation being proposed by the Agency?

No input was provided by stakeholders.

11. What scientific data was used to develop the rule or the measurable outcomes of the rule? How does this data support the regulation being proposed?

This question does not apply to these rules because no scientific data was necessary to develop or measure their outcomes. Instead, Commission staff reviewed its statutory mandates and looked at how other jurisdictions approached the topics in this package. Further, staff considered whether existing rules were the most efficient means by which to maintain the integrity of casino gaming and whether any requests for amendments, waivers, or variances had been requested or granted to the regulated community. In so doing, the Commission was

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able to use, as much as possible, rules the regulated community is accustomed to and is common in other jurisdictions, with minor adaptations to remain in compliance with Ohio law.

12. What alternative regulations (or specific provisions within the regulation) did the Agency consider, and why did it determine that these alternatives were not appropriate? If none, why didn't the Agency consider regulatory alternatives?

When first adopting these rules, Commission staff reviewed the rules adopted in other jurisdictions, including Kansas and New Jersey, where members of staff had formerly been employed. In reviewing these amendments, staff considered past practices of the Commission, any comments on the rules, any waivers or variances to existing rules that had been requested and granted, and current trends in the casino regulatory environment. These rules are a conglomeration of the rules used in other jurisdictions with adaptations made for Ohio law.

13. Did the Agency specifically consider a performance-based regulation? Please explain. *Performance-based regulations define the required outcome, but don't dictate the process the regulated stakeholders must use to achieve compliance.*

Where appropriate, the rules include a performance-based component wherein they set the floor for compliance but do not completely dictate how stakeholders are to achieve compliance (i.e. they dictate minimum, statutorily required standards, but leave the specifics of how to achieve those standards to the affected stakeholders). Additionally, Ohio Adm.Code 3772-1-04 allows stakeholders to seek waivers and variances from these rules, which the Commission will evaluate on a case-by-case basis and may grant as long as it determines that doing so is in the public's best interest. Past performance of any requestor would be considered in determining whether a waiver from any specific provisions of these rules is appropriate.

14. What measures did the Agency take to ensure that this regulation does not duplicate an existing Ohio regulation?

This question does not apply to these rules because no other regulations in this area currently exist with respect to casino gaming. To the extent that this package amends existing administrative rules, many of those amendments are meant to ensure these rules are not duplicative of the Casino Control Law or other Revised or Administrative Code requirements.

15. Please describe the Agency's plan for implementation of the regulation, including any measures to ensure that the regulation is applied consistently and predictably for the regulated community.

The rules in this package relate to disciplinary actions and involuntary exclusions, both of which are procedurally governed by Chapter 119 of the Revised Code, meaning they are subject to a robust notice and opportunity for hearing process that is open to the public. This, itself, will ensure consistent and predictable applications. Further, to ensure ongoing compliance with all the Commission's rules and statutory provisions, there are gaming agents and financial auditors observing, evaluating, and investigating casino operations on site. Any issues that arise at the facilities are funneled to the Commission's central office in Columbus,

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Ohio, where applicable policy staff and the Legal Division work with the Executive Director to coordinate a consistent response and conduct outreach to the regulated community.

Adverse Impact to Business

16. Provide a summary of the estimated cost of compliance with the rule. Specifically, please do the following:

a. Identify the scope of the impacted business community; and

The affected stakeholders include casino operators, management companies, holding companies, gaming-related vendors, and independent testing laboratories.

b. Identify the nature of all adverse impact (e.g., fees, fines, employer time for compliance,); and

The nature and potential adverse impact from these rules include casino operator time and payroll in excluding individuals on the involuntary exclusion list from the facility and reporting their presence to the Commission, as well as fines or other, non-monetary sanctions, including license denial, restriction, or revocation, for noncompliance, as laid out in Ohio Adm.Code 3772-22-01.

c. Quantify the expected adverse impact from the regulation.

The adverse impact can be quantified in terms of dollars, hours to comply, or other factors; and may be estimated for the entire regulated population or for a “representative business.” Please include the source for your information/estimated impact.

- **3772-22-01 (no change)**, titled “Sanctions.” The Commission anticipates an adverse business impact from this rule that will vary depending upon the performance of stakeholders under other rules. Sanctions, by their very definition, carry an adverse impact to a business. That being said, sanctions are an important tool in ensuring the integrity of casino gaming and are one of the Commission’s required rules under R.C. 3772.03(D). Moreover, the Commission uses its sanction power not simply as a punishment but as a tool to ensure future compliance, and those facing sanctions have all the due process guarantees that Ohio law affords to them prior to sanctions being imposed. Finally, only those who violate R.C. Chapter 3772. or the rules adopted thereunder face potential sanctions.
- **3772-23-01 (new)**, titled “Involuntary exclusion list.” The Commission anticipates minimal business impact from this rule from the casinos needing to exclude individuals on the list and from the requirement that the casinos notify the Commission of any involuntarily excluded individuals on property. However, these minimal impacts are blunted by the fact that the Commission is required to adopt a rule on this topic by R.C. 3772.031 and that these requirements naturally flow from that statutory provision. Moreover, this rule, while new, is comprised solely of provisions from current Ohio Adm.Code Chapter 3772-23, meaning that any business impacts from this rule have all

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been in existence since the inception of casino gaming in the state. Finally, the “new” version of this rule removes several specific requirements on casino operators, including the removal of those provisions formerly in Ohio Adm.Code 3772-23-06(A), (D), (E), and (F).

3772-23-06 (amendment), titled “Casino operator duties.” The Commission anticipates a positive business impact from this rule’s rescission. Through this rescission and adoption of the new version Ohio Adm.Code 3772-23-01, the Commission is able to still comply with its statutory mandate under R.C. 3772.031 to adopt a rule on this topic, while rescinding some further business impacts that the Commission believes are not statutorily required. In particular, this positive impact will come from the complete removal of paragraph (A), (D), (E), and (F) from this new rule and from the streamlined regulations, which will make it easier and less time consuming for the entities to find applicable regulatory standards.

17. Why did the Agency determine that the regulatory intent justifies the adverse impact to the regulated business community?

The regulatory intent justifies any adverse impact because Article XV, Section 6(C) of the Ohio Constitution and R.C. Chapter 3772 require the Commission to ensure the integrity of casino gaming, specifically by requiring the Commission to adopt and enforce an involuntary exclusion list and to adopt rules related to the penalties for violations of its rules. Moreover, the regulatory intent justifies any adverse impact because casino gaming is a highly regulated industry. Unregulated gaming poses a threat to the public welfare and raises the potential for fraud and abuse. To mitigate these threats, the Commission, like other gaming regulatory bodies, is using its regulatory authority to establish a best practice framework. Finally, the amendments in this package further lessens any business impact, by removing certain restrictions and streamlining redundancies. For a more detailed analysis of the individual justifications applicable to each rule, please see the answers given in 16.c.

Regulatory Flexibility

18. Does the regulation provide any exemptions or alternative means of compliance for small businesses? Please explain.

Yes (indirectly), though it is unlikely this will be necessary since these regulations mostly impact casino operators, gaming-related vendors, and testing laboratories, none of which likely constitute a small business. These amendments indirectly provide exemption or alternative means of compliance through Ohio Adm.Code 3772-1-04, which permits the Commission, upon written request, to grant waivers and variances from the rules adopted under R.C. Chapter 3772, including these rules, if doing so is in the best interest of the public and will maintain the integrity of casino gaming in the State of Ohio.

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19. How will the agency apply Ohio Revised Code section 119.14 (waiver of fines and penalties for paperwork violations and first-time offenders) into implementation of the regulation?

Though it is unlikely R.C. 119.14 will apply to these amendments because the rules largely impact casino operators, gaming-related vendors, and testing laboratories, none of which likely constitute a small business, the Commission will adhere to the statutory requirements thereunder, if applicable.

To the extent R.C. 119.14 would apply to a violation of these amendments, the Commission will provide verbal and written notification to the small business to correct the paperwork violation. Thereafter, the Commission would allow the small business a reasonable time to correct the violation. The Commission and its staff would also offer any additional assistance necessary to aid in remediation of the violation. No further action would be taken unless the small business fails to remedy the violation within the reasonable time allotted by the Commission.

20. What resources are available to assist small businesses with compliance of the regulation?

The Commission and its staff are dedicated to working with members of the regulated community and the public to effectively and efficiently regulate casino gaming in this state. As a result, the following resources are available:

- Commission's mailing address: 100 E. Broad St., 20th Floor, Columbus, OH 43215
- Commission's toll-free telephone number: (855) 800-0058
- Commission's Division of Licensing telephone number: (614) 387-5688
- Commission's fax number: (614) 485-1007
- Commission's website: <http://www.casinocontrol.ohio.gov/>
- Commission's email: info@casinocontrol.ohio.gov
- Commission's casino gaming listserv:
<https://ohio.us7.list-manage.com/subscribe?u=1c618d44ec5c718843ae2e7bb&id=3d36674d21>

Also, all members of the regulated community and public may, in accordance with rule 3772-2-04, request to address the Commission during a public meeting. Finally, all members of the regulated community may, pursuant to rule 3772-1-04, request waivers and variances from the Commission's casino gaming regulations.

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Cox, William

From: Ohio Casino Control Commission <Jessica.franks@casinocontrol.ohio.gov>
Sent: Monday, April 19, 2021 1:44 PM
To: Cox, William
Subject: Casino Gaming Rules for Comment

[View this email in your browser](#)



Casino Gaming Stakeholders,

As you may know, Ohio law generally requires rules to be reviewed and refiled at least once every five years. Pursuant to that requirement, the following rules have been reviewed by Commission staff and are now being put forward for comment: 3772-22-01 (Casino gaming disciplinary actions), 3772-23-06 (Involuntary exclusion casino operator licensee or applicant duties) (rescind), and 3772-23-01 (Involuntary exclusion list) (new). To be clear, Chapter 3772-23 (Involuntary Exclusion) is being rescinded in its entirety and replaced with only one rule, so new rule 3772-23-01 appears without any changes tracked. The rest of Chapter 3772-23, which again is being completely rescinded, is not being presented for comment, as it has no business impact. The proposed versions of the above-listed rules can be found [here](#).

As always, please feel free to forward this communication to anyone else you think may be interested in these rules. Additionally, anyone may sign up for the Commission's casino-gaming listserv themselves [here](#). If you would like to unsubscribe from this listserv, you may do so using the link located at the bottom of this email.

We understand that you may have questions or would like additional information before commenting, and if that is the case, we encourage you to reach out to your normal contacts at the Commission or to Matt Oyster, (614) 387-5859 or

matt.oyster@casinocontrol.ohio.gov, at your earliest convenience. **If, in the end, you would like to provide formal written comments, please email them to Matt by 5:00 p.m. on April 30.**

While you will have some additional chances to comment on these rules, including when they are filed with the state's Common Sense Initiative Office, please note that it is much easier for the Commission and for stakeholders to work out any questions or comments directly before the rules start the formal rule filing process.



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Exhibit 2

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