

### **X. A. 5. TREATMENT AND PREVENTION**

#### **A. Underage Gambling Policy.**

In accordance with Section 1332 of the Racing, Pari-Mutuel Wagering and Breeding Law, persons under the age of 21 (other than authorized employees) are prohibited from entering the casino area of the Gaming Facility. Recognizing that young adults inherently have the highest rates of “at risk” behavior, Traditions Casino will take appropriate measures to prohibit underage gambling, including but not limited to:

1. Signage with an Underage Gambling related messages will be prominently posted at all entrances to the casino.
2. Literature regarding Underage Gambling will be placed through the facility, including at the Player’s Services Counter.
3. All casino employees will be advised that they have an affirmative responsibility to identify suspected underage gamblers or underage persons in the casino and to report them immediately to Security.
4. Security Officers will be posted at all entrances to the casino and will challenge any person appearing under the age of thirty (30) for government-issued photo identification. Security personnel will be equipped with “state of the art” scanners capable of detecting false identification credentials.
5. There will be a system in place for logging and recording attempts by underage persons to enter the casino.  
If an underage person is found to be in the casino he/she will be immediately removed from the casino and law enforcement will be summoned.
6. In emergency situation where an underage person has a legitimate need to enter the casino, he/she must be escorted by a Security Guard. Unattended minors in the public areas will not be permitted and all employees will be trained on company policy in this regard. Without limitation, parking lots and structures will be monitored for unattended minors left in automobiles.

#### **B. Access To Money Policy**

Recognizing that overly convenient access to money may facilitate problem gambling, Traditions Casino will design its system of internal controls and related computer systems to comply strictly with the regulations of the New York State Gaming Commission to be adopted pursuant to Section 1338 of the Racing, Pari-Mutuel Wagering and Breeding Law, including but not limited to:

1. Limiting the number, location of and maximum withdrawal amounts from automated teller machines (“ATM’s”).
2. Prohibiting ATM’s from accepting electronic benefit cards or similar negotiable instruments issued by the State or political subdivisions for the purpose of accessing temporary public assistance.
3. Prohibiting the use of specified negotiable instruments at the Gaming Facility and the use of credit cards, debit cards and similar devices in slot machines or at table games.
4. Prohibiting patrons from cashing paychecks at the Gaming Facility.

### **C. Suspension of Credit Privileges.**

As described in Exhibit X.A.1., the Manager has implemented a system for voluntary suspension of credit privileges at its existing three (3) casinos. Traditions Casino will design its system of internal controls and computer systems to implement this initiative in accordance with Section 1339-9 of the Racing, Pari-Mutuel Wagering and Breeding Law and any administrative regulations adopted by the New York State Gaming Commission thereunder.

### **D. Community Based Treatment and Prevention.**

Traditions, in consultation with the Manager, has requested that the New York Council on Problem Gambling (NYCPG) conduct a community-based need assessment and provide recommendations that include community and site specific suggestions related to problem and responsible gambling. Traditions has adopted the below described NYCPG recommendations. After conducting needs assessment interviews with several key informants in Johnson City, Binghamton and Broome County, Traditions will:

#### **1.) Problem Gambling Steering Committee**

Traditions will encourage that Broome County provide representatives to form a steering committee to address problem gambling. The Problem Gambling Steering Committee will be comprised of local officials, Traditions staff, problem gambling treatment and prevention professionals, local school personnel, consumers and community members. The steering committee will meet quarterly to address ongoing issues, review current programs and practices and support the work of the community-based providers.

#### **2.) Problem Gambling Treatment**

1. In partnership with **Lourdes Hospital Center for Mental Health**, Traditions will work to provide problem gambling specific treatment for individuals and family members in Broome County.
2. Treatment will be high quality, culturally competent and provided regardless of ability to pay.
3. Traditions On-site Responsible Gambling Resource Center Staff will refer patrons requesting assistance or those who have self-excluded to Lourdes.
4. Traditions Onsite RGRC staff will contact the appropriate clinic to schedule an initial intake assessment, when requested by the casino patron.
5. Lourdes will provide daily scheduled walk-in hours so that casino patrons in need will be able to see a clinician specialized in Problem Gambling Treatment within 24 hours of being referred. Clinic hours will be extended to accommodate evening and weekend clients if the need becomes necessary.
6. Lourdes will make available for the convenience of the client Problem Gambling specific treatment services at any of its sites providing behavioral health care.

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7. Both individual, family and group therapy will be available for problem gambling clients.
8. Individual therapy will focus on the use of Cognitive Behavioral Therapy and Motivational Interviewing or other evidenced based practices for treating Problem Gambling as they become available.
9. Clinicians will encourage that the client/ family member also participate in Gamblers Anonymous, Gam-Anon or another self-help program.
10. All patients will participate in the development of a care plan to address problem gambling or risk behaviors for the development of a gambling disorder
11. Lourdes will provide comprehensive outreach attempts for individuals who do not keep initial appointments which includes at least 3 telephone outreach attempts (at least one off hours) and one mail/ letter outreach attempt.
12. Lourdes will make a reasonable attempt to add a community member with a gambling problem to the Board of Directors.
13. Lourdes will work with the New York Council on Problem Gambling and utilize their expertise and institutional knowledge as it relates to treatment program successes and challenges.
14. All Executive level and supervisory level staff will be trained in problem gambling
15. All behavioral health providers delivering direct problem gambling treatment services must complete a specialized training program in problem gambling as well as hold a NYS recognized mental health license.
16. School based health center staff based health center staff will be trained in the warning signs of problem gambling and learn how to utilize problem gambling screening tools.
17. Lourdes will advertise its problem gambling services in all of its facilities and on the organization website.
18. Encourage and support the development of additional Gambler's Anonymous and Gam- Anon meetings in the areas where treatment is provided.
19. Lourdes will develop a specific system for tracking problem gambling client outcomes.
20. With the exclusion of individual identifying information these outcomes will be shared with Traditions and The New York Council on Problem Gambling upon request, in an effort to assess and improve onsite and community based programs intended to assist problem gamblers.
21. Traditions Casino will negotiate treatment session rates with Lourdes and will provide adequate funds to cover the cost of the daily walk-in time slot(s) and to reimburse any costs incurred in treatment, not covered by the client's insurance.
22. Traditions Casino will provide funds to cover the cost of problem gambling related outreach and staff training.

### **3.) Problem Gambling Prevention, Outreach and Education**

- a. In partnership with **Lourdes Youth Services**, Traditions will work to develop

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adequate prevention, outreach and education to vulnerable populations in Broome County. A letter verifying the ability and desire to form this partnership is located in exhibit X.A.5.a.

- b. Lourdes will be contracted and begin their outreach and education efforts once Traditions is granted the casino license, prior to the opening of the casino.
- c. All Lourdes Youth Services staff will be trained on Problem Gambling related issues. Staff delivering problem gambling programming will be required to complete the New York Council on Problem Gambling 30 hour Problem Gambling Prevention Specialist training.
- d. Traditions will fund this program at the rate of one professional full time equivalent and will provide for adequate public awareness efforts and program expenses. The funding will be directly negotiated between Traditions and Lourdes.
- e. Initiatives to address problem gambling will focus on impacts in the workplace, family, neighborhood, youth, older adults, public safety and crime prevention and public awareness.
- f. Problem gambling public awareness efforts will target messaging at specifically vulnerable populations including youth, parents as influencers on youth, family members of problem gamblers, individuals and families with substance abuse disorders, college students, low income residents and aging adults.
- g. Based on the target population of each campaign, problem gambling public awareness efforts will be developed to specifically reach each population where they currently receive other types of messaging and will be market tested with a relevant focus group.
- h. Family impact issues to be addressed include child abuse and neglect, co-occurring substance abuse and gambling, divorce, domestic violence, homelessness, bankruptcy and suicide. Problem gambling education will be infused into Lourdes Parents and Children Together (PACT) program.
- i. Partners in this process will minimally include Faith-based programs, school districts, mental health providers, Department of Social Services, local Office for the Aging chapter, Binghamton University, SUNY Broome and Davis College, local law enforcement agencies, and suicide prevention networks.
- j. The problem gambling version of the evidenced-based screening and brief intervention program "Teen Intervene" will be utilized at all sites currently implementing the "Teen Intervene" program
- k. Lourdes will when and where possible include the evidenced-based problem gambling prevention program "Stacked Deck" in local school districts or other youth-based programs in Broome County. The program is intended for grades 9-12 and must be implemented with fidelity.
- l. Lourdes will work with all local school districts to develop and implement a no gambling policy on school premises and at all school sponsored events
- m. Outreach and education sessions will be conducted with school personnel, parent teacher associations and students.
- n. Age appropriate programming and education on problem gambling will target youth beginning at age 12.

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- o. Problem gambling education will be infused into all Lourdes Alcohol and Drug Education Prevention Team (ADEPT) relevant prevention, outreach and education programs.
- p. Problem gambling resources and materials will be available at all Lourdes programs
- q. Outreach and education specifically targeted at the Aging Adult population will take place at senior centers, retirement community events, through partnership with Broome County Office for the Aging and Action for Older Persons.
- r. All counseling based services provided by Lourdes and its subsidiaries will implement problem gambling screening into the intake assessment process and refer to problem gambling specific treatment. Problem Gambling screening will be included in the intake process at Lourdes 4 high school and 3 middle school Student Assistance Programs and will be added to the Mental Health Juvenile Justice Project (MHJJ).