



Mille Lacs Band of Ojibwe Indians
Gaming Regulatory Authority
Detailed Gaming Regulations

PROBLEM GAMBLING PREVENTION PROGRAM

Document No. DGR – 3

Effective: October 11, 2005

I. SCOPE. For the purpose of meeting the Mille Lacs Band’s responsibility to assist in the prevention and education of compulsive gambling, the Band has developed the following Problem Gambling Prevention Program to meet the needs of casino patrons, employees, the local community and the state. In its role as a responsible member of the gaming industry, the Band recognizes there are social costs associated with problem gambling and is therefore committed to promoting responsible gaming for our employees, our patrons and our local community.

II. POLICIES. The Band offers gaming as an entertainment experience. There are those patrons, however, for whom gambling may go beyond entertainment and become a problem, or even a compulsion, with adverse financial and social impacts for themselves and others. The efforts of the Band in this regard will focus on the following areas as a matter of policy:

Section 1. A Referral System. A referral system based upon a current, computerized directory of organizations and individuals that have a reputation for providing effective assistance for individuals with gambling problems, including a process for referring patrons who seek help with such problems to resources listed in the directory and for encouraging them to take advantage of such resources;

Section 2. Associate Training. Associate training for all associates who have regular contact with patrons including but not limited to a description of the Problem Gambling Prevention Program, the nature, extent and effects of compulsive gambling, how to recognize the warning signs of potential and actual gambling problems, and techniques for intervening constructively with problem gamblers;

Section 3. Promotional Materials. Patron information and education including encouraging patrons to gamble responsibly, increasing patrons’ awareness of the signs and symptoms of problem and compulsive gambling, informing patrons of how and where they can obtain counseling regarding problem and compulsive gambling for themselves or others by providing information on the Problem Gambling Prevention Program through:

- A. Signs that clearly and in plain language inform patrons how to obtain assistance in dealing with gambling problems. Such signs shall be prominently posted at each entrance and exit, at any check cashing facility within the Gaming Enterprise, near any ATM cash machines at the Gaming Enterprise, and any other locations as determined by the Commissioner of Corporate Affairs.
- B. Promotional material containing guidelines and suggestions about responsible gambling, the need to get help for problem gambling behavior, and the sources of such help.

Section 4. Exclusion Requests. Placing patrons on the Exclusion List established pursuant to 15 MLBSA § 312(d) as requested by the patron or an immediate family member.

III. IMPLEMENTATION STRUCTURE.

Section 1. Key Resources. In order to accomplish the Band’s goals and to implement its policies, the Band has established a group of Key Resources including the casino’s General Manager, Assistant General Manager, Vice Presidents of Security, Guest Services, Slots, and Table Games, CSO’s, Directors of Table Games (Shift Managers), Slot Service, Security, Player Development and Bingo, and Security Shift Managers and Assistant Shift Managers. The primary tasks of the Key Resources are:

- A. Oversee implementation of the Problem Gambling Prevention Program;



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- B. Provide structured training for Associates on issues related to problem and underage gambling;
 - C. Oversee the development and distribution of all print and electronic information regarding the Program;
 - D. Monitor the quantity and quality of problem gambling treatment available in the local community;
 - E. Routinely consult with experts in the prevention and treatment fields for the purpose of updating and modifying the Program as appropriate;
 - F. Monitor and evaluate the effectiveness of the program and solicit both employee and patron feedback;
 - G. Generate an annual report summarizing the Key Resources' activities and results for the previous year and recommendations for improvement or changes in the program as appropriate.

IV. IMPLEMENTATION PLAN.

Section 1. Referral Systems. As a responsible member of the gaming industry and the local community, the Band is not only committed to promoting responsible gaming with its patrons, but is also committed to promoting and supporting prevention and treatment programs within the community. Key Resources and Associates may make referrals to the States Approved Gambling Treatment Providers. A list of State Approved Gambling Treatment Providers shall be readily available to Key Resources and Associates.

Section 2. Training. To ensure the highest level of professional training available for the employees, the Band may retain the services of a professional Problem Gambling Prevention consultant. The Problem Gambling Prevention consultant may assist in the development of the Associate training program for the Band and may be in charge of actually conducting the training. The Band's Associate training program shall be organized as follows:

- A. For supervisors and shift managers:
 - 1. Problem Gambling Prevention training shall be scheduled annually for all Supervisors and Managers having direct patron contact.
 - 2. Specific topics include:
 - a. Prevalence of problem and underage gaming.
 - b. Relationship of problem gambling to other addictions.
 - c. Social cost of problem gambling.
 - d. Vulnerable populations.
 - e. Cultural issues.
 - f. Employee gambling.
 - g. Signs of problem gambling in the casino.
 - h. Customer assistance and referral.
 - i. Importance of proactively addressing problem and underage gambling.
- B. For Associates:
 - 1. All Associates having direct patron contact are provided with training in problem and underage gambling awareness, recognition and patron assistance.



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2. The Band's philosophy and commitment to promoting responsible gaming will be included in the employee handbook given to each new employee.
3. New employee orientation will include a formal presentation addressing the various issues associated with problem and underage gambling. The topics addressed include:
 - a. The Band's commitment to preventing underage gambling and assisting customers and employees who may have a gambling problem.
 - b. Signs and symptoms of problem gambling.
 - c. Prevalence of problem and underage gambling.
 - d. Relationship of problem gambling to substance abuse and other risk factors.
 - e. Social costs of problem gambling.
 - f. Child protection and safety.
 - g. The Band's policies and procedures for dealing with minors and problem gamblers.
 - h. Availability of counseling, treatment and support services.
4. Employee refresher workshops on problem and underage gambling will be conducted semi-annually.
5. Posters calling attention to the issues of problem and underage gambling will be prominently displayed in the employee break room and around the time clock.
6. Periodic paycheck stuffers will be used to remind employees about the issues of problem and underage gambling.
7. Information regarding the confidential counseling services available to employees through the Band's own Employee Assistance Plan.

Section 3. Patron Information and Education. The Band will provide patrons with printed and electronic information regarding problem and underage gambling, as well as information on counseling services through signs and promotional materials and/or one-on-one discussion.

- A. Casino personnel may become aware of problem gambling through observation of problem gambling behavior in a patron, a request from a patron for assistance with a gambling problem, or a request from a friend or family member for assistance with a patron's gambling problem. In the event an Associate observes significant signs of problem gambling in a patron's behavior or comments, the Associate is required to communicate these observations to a Key Resource.
- B. The Key Resource, in conjunction with Security, will then further assess the situation and if necessary, and appropriate, initiate a conversation with the patron in order to identify the patron's specific needs. The Key Resource may assist the patron in the following ways:
 1. Provide the patron with compulsive gambling brochures and business cards and assist in contacting the toll-free Helpline. The Helpline counselor will refer the patron or family members to the appropriate counseling services.
 2. Assist the patron with immediate practical needs by contacting relatives or friends.
 3. Explain and offer the self-exclusion option if the patron indicates a desire to cut back or stop his gambling but feel he is unable to stay away from the casino. Self-exclusion forms are available at the casino management offices. The patron may also request to have his name removed from any marketing and promotion lists and to have his check cashing capabilities restricted.



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- C. If the Key Resource determines that direct communication with the patron or patron's family member was necessary, the Key Resource completes an Incident Report and may refer the patron to the Vice President of Security.
 - D. If the patron requests a self-exclusion form, the Security Manager is notified. If the patron elects to complete a self-exclusion form, the Security Manager shall forward the exclusion form to the Director for consideration and issuance of a Compliance Determination pursuant to 15 MLBSA § 312. The patron's placement on the Exclusion List is governed by the applicable provisions of the Act.

History. Approved by Band Assembly on October 11, 2005.

Changes to: IV. Section 1 Referral Systems. Delete following organizations: Added "States Approved Treatment Providers. A list of State Approved Treatment Providers shall be readily available to Key Resources and Associates."; Delete A-F.; IV. Section 2. Training (A) Delete "1. All Supervisors and shift managers having direct patron contact are provided with training in problem and underage gambling awareness, recognition, and patron assistance. 2. Half-day seminars are scheduled annually for all supervisors, with additional half-day training for all shift managers." Added "1. Problem Gambling Prevention training shall be scheduled annually for all Supervisors and Managers having direct patron contact." ; IV. Section 2. Training (B)(3) Delete "half-day" Added "formal"; IV. Section 3. Patron Information and Education (A) Delete "Typical signs of a potential gambling problems and diagnosis are illustrated in Appendix 2."; Delete Appendix 1; Delete Appendix 2 approved by the Gaming Regulatory Authority Board November 4, 2010. **Effective Date of Changes November 4, 2010.**