Caesars and Responsible Gaming's "Third Rail"

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Editor's Note: Researchers, policy makers, gambling operators, and consumers can all play a part in promoting responsible gambling. Today's Op-Ed/Editorial illustrates how a gambling operator has teamed up with academic researchers to limit harm associated with excessive gambling. Dean Hestermann and Jennifer Shatley from Caesars Entertainment Corporation, Carl Braunlich from the University of Nevada, Las Vegas, and Jim Whelan from the University of Memphis describe their efforts to develop interventions with at-risk gamblers on the casino floor.

In the Spring of 2001, Phil Satre, Harrah's Entertainment, Inc. Chairman and CEO (now called Caesars Entertainment Corporation), visited properties to roll out the company's new Code of Commitment, which spelled out the corporate obligation to the well-being of their communities, employees, and customers. While presenting at an all-employee meeting in Atlantic City, a casino dealer boldly asked: "What do we do about a customer who doesn't come out and admit a gambling problem but says things that sound like her gambling is hurting her and her family?"

Satre didn't miss a beat: "We don't take that customer's business."

Well, then. Among the notable aspects about this interaction was that nowhere in Harrah's new Code of Commitment was such a policy articulated. Indeed, that policy had never been part of Harrah's pioneering responsible gaming programs at any point since they began in the 1980s. These programs were generally passive, focused on collateral materials containing information on gambling addictions and resources for help. Employees, if asked by a customer, were to direct customers to these materials. Any interaction about problem gambling tended to be at a customer's request. The goal was to provide the customer with the information and promote their understanding of things related to problem gambling.

Satre's unequivocal statement that his company's corporate ethos included actively addressing the issue of problem gambling set off a chain of events that led to his company's adoption of a proactive approach to responsible gaming. The centerpiece was a Restriction and Exclusion Policy that included processes to ban

a customer from casino play at the discretion of casino management.

Developing the policy required taking a firm hold on what had long been considered, at least within casino boardrooms, “the third rail” of responsible gaming: directly intervening with casino customers because of their gambling behavior. In this editorial, we’ll describe the theoretical and practical underpinnings of Caesars approach and explain why we believe it is a useful advance in the promotion of responsible gaming.

The American casino industry, prior to Caesars leap into the breach, had been mostly silent on the issue of “intervention” with casino customers. For example, the American Gaming Association’s compilation of industry responsible gaming practices (AGA, 1996) contains no examples of similar policies and practices. Many factors explain this historical reticence, perhaps chief among them a lack of consensus on the existence and utility of “red flag” customer behaviors that might justify an intervention (Allcock et al., 2002). More recent scholarship has likewise bemoaned the variability among behaviors on the casino floor that might indicate problematic play, with Hing et al. (2013) concluding that “variations in venue patrons’ outward display of problem gambling behaviours, and in how venue staff perceive and act on these indicators, mean that identifying patrons with gambling problems in the venue may never be accurate if based solely on observable behaviours.” At the same time, many have called for the need and value of the gaming industry taking a proactive approach to problem gambling within the casino industry (e.g., Blaszczynski, Ladouceur, & Shaffer, 2004; Guttentag et al.,2012; LaPlante et al., 2012).

The authors of this editorial were among the (what sure seemed like) legions of casino executives, front-line employees, clinicians, lawyers, and international researchers tasked with answering the crucial sequelae to Satre’s “We don’t take their business” dictum: what on the casino floor should trigger the process that may lead to banning a customer from playing? And how exactly do we approach customers whose play might be problematic? A number of considerations informed our decisions:

We had no clear procedures for employees who talked to customers about their gambling – conversations that were initiated by customers themselves, or, as we learned, conversations that were initiated by employees absent any training, guidance, or company blessing. And there was no record of these conversations or

their outcomes.

-There is, in fact, no consensus concerning behaviors on the casino floor that predict or demonstrate problem gambling. It's often on the way home that customers experience regret, anger, and guilt. Gamblers, even problem gamblers, tend to enjoy being in the action.

-Behaviors, even those that some deem as the proverbial red flags to conclusively reveal a gambling problem, are often ambiguous. Is a customer pounding on a machine a problem gambler, or an angry gambler? All of the behaviors that are typically discussed as indicators of problem gambling cannot be construed as such at the outset, and in all fairness should not be portrayed in this manner to casino employees who then believe they can diagnose gambling problems on the fly. Getting multiple cash advances at the cage, spending long periods of time on the casino floor, trying to borrow money from employees, and arguing loudly with a spouse are all situations that have many and various sources of motivation.

-Casino employees are trained to deliver customer service. Not only are they not trained or expected to be mental health diagnosticians, they don't have time to "observe customer behavior." Effective promotion of responsible gaming on the casino floor should leverage and build from a customer service perspective.

-Casino employees do develop relationships with regular customers. Among regular customers and non-regular customers alike, casino employees are trained to hear and respond to customer concerns.

-And, probably the most critical issue to shaping how to engage the customer who may be having gambling related problems is that customers sometimes tell casino employees or otherwise give voice to how gambling is affecting their lives. These may be direct comments like "You've taken all my money and now I can't pay the rent" or indirect comments like "This is just not fun." Casino employees, in turn, become concerned when they are aware that their customers experience negative consequences related to their gambling. Employees' humanity and basic decentness don't disappear when they don a croupier or cocktail server uniform.

So, armed with these findings, what does Caesars do now that it didn't do then?

First, during training, employees in customer contact positions discuss in general terms among themselves what they have seen or heard on the casino floor that

may have caused them to be concerned about problem gambling issues. The shared experience from these discussions is that concern does arise at times, that behaviors can often be misconstrued, and that the only actionable indicator that gambling might be harmful is what we hear the customer tell us that causes us concern. From an instructional perspective, employees can be trained to act on their personal concern for a guest, as it is both a recognizable state of mind and a potent trigger to move employees to action. On the other hand, a training protocol based on red flag non-verbal behaviors is asking the impossible of employees and induces guilt in employees who feel it is solely up to them to figure out who might have gambling problems among customers they are serving.

Next, management intervenes with customers with whom there is concern regarding their ability to gamble responsibly. A process is in place in Caesars properties for the reporting and logging of these concerns. A group of management employees called Responsible Gaming Ambassadors, one or more of whom is present on a casino floor at all times, is trained to accept and record any such concern in a stand-alone IT platform called a Responsible Gaming Log. Responsible Gaming Ambassadors, based upon the information received about a customer, take the initiative to meet privately with the customer, express the company's concern and offer assistance. Assistance takes the form of responsible gaming brochures or other resources, an explanation of self-restriction or self-exclusion programs, and an explanation any state sponsored self-exclusion program. There is a well-defined structure for these meetings based on the principles of motivational interviewing (Miller & Rollnick, 2013; Whelan, Steenbergh, & Meyers, 2007), an empirically supported approach to promoting behavioral change. Fundamental to this approach is understanding the need to enhance a person's awareness of and motivation for change. Central is that the customer himself is the agent of change, who needs the support and not pressure from the Responsible Gaming Ambassador.

As for exclusion, customers may be banned at the company's discretion based on our employees' concerns. The Responsible Gaming Ambassador is empowered to make recommendations to the property Responsible Gaming Committee regarding company-imposed limits on a customer's gaming privileges. A Corporate Review Panel reviews the matter for possible exclusion at the company's discretion, based on the following general standard: Is there a reasonable risk that the patron does not responsibly engage in gaming?

Essential to the exclusion policy is consistent enforcement of exclusion decisions. A proprietary, patented, information technology platform uses the information in the Responsible Gaming Log to disseminate, in real time, information on customers' status with regard to responsible gaming. Using interfaces with various property-level IT systems through the company, stops can be placed on the issuance of loyalty cards, on receiving credit, check cashing privileges, and mailing lists for promotional and marketing materials. An excluded customer who uses a loyalty card in a gaming device triggers an alarm within the slot management program to alert appropriate staff of his or her presence. Jackpot payoff procedures include a check to ensure the customer is not currently excluded.

Gambling disorders are complex, and the process of diagnosing disordered gamblers has been evolving in the mental health community for the past twenty years. Casino employees cannot be expected to determine who may have a problem with their gambling. But they can be expected to listen to their customers and determine how to exceed their expectations for various products and services. And they can be expected to listen for comments that may cause them concern about a customer's ability to gamble in a responsible manner.

When employees are given a means to communicate their concern to management, and believe their concerns are handled in a professional manner, two important objectives are achieved. An employee can gain the sense of being an important part of an effort to encourage only the responsible use of casino gaming services, and as a result can be proud of a company that trusts their employees to do so. And, as important, a customer who may not be able to gamble responsibly may be brought into a conversation with management and offered assistance or banned from the casino.

We believe this approach to responsible gaming leverages the human compassion of the thousands of Caesars employees who want to do a good job, and who want to be empowered to help their customers when they can.

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