



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 2022 Sports Gaming Rule – Provisional Licenses

Rule Number(s): 3775-4-99

Date of Submission for CSI Review: 2/16/2022

Public Comment Period End Date: 3/2/2022

Rule Type/Number of Rules:

New/ 1 rule

No Change/ 0 rules (FYR? N/A)

Amended/ 0 rules (FYR? N/A)

Rescinded/ 0 rules (FYR? N/A)

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 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

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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.

This is the Commission's first sports gaming rule for filing with CSI. Sports gaming is being legalized and regulated pursuant to House Bill 29 of the 134th General Assembly. That bill set a comprehensive licensing and regulatory framework for sports gaming, under the jurisdiction and broad rulemaking authority of the Commission. The bill requires that this business sector start by January 1, 2023, under the Commission's licensing and regulations. To enable these businesses to start by or before the required start date, the Commission is advancing the below provisional licensing rule as quickly as possible, as it allows, once effective, the Commission to begin accepting applications for review and determination.

3775-4-99, titled "Provisional licenses." This rule specifies the process, fees, and requirements for a person to obtain a provisional sports gaming license. To do so, an applicant must submit a provisional request, a complete application for the applicable license type, and pay the applicable fee. The fees vary depending upon the application type from \$15,000 for all types of sports gaming proprietors to \$150 for sports gaming employees. All fees paid pursuant to this rule are credited to the applicant's ultimate plenary application or license fee. The rule then allows the Executive Director to issue a provisional license, which pursuant to section 4 of House Bill 29 are good for three months and are enabled to be renewed once—for a total of six months. The purpose of this rule is to allow the Commission to meet section 4 of House

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Bill 29 and to assist the Commission in standing up the sports gaming regulatory framework in a quick, consistent, and responsible manner.

- 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.**

3775.01, 3775.02, 3775.03, 3775.04, 3775.041, 3775.05, 3775.051, 3775.06, 3775.07, 3775.08, 3775.09, and section 4 of House Bill 29 of the 134th General Assembly.

- 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 because the federal government does not regulate sports gaming in this state. Rather, sports gaming is permitted and controlled by Ohio's Sports Gaming Control Act (i.e., R.C. Chapter 3775).

- 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)?**

R.C. Chapter 3775 requires the Commission to ensure the integrity of sports gaming and to prescribe rules for how sports gaming should be conducted, including those related to licensure. To ensure the integrity of sports gaming and requirements of R.C. Chapter 3775, it is imperative that only persons who are eligible and suitable be issued licenses. Moreover, this rule implements the General Assembly's statutory directives for the Commission to stand up the regulatory framework for sports gaming by January 1, 2023, including the use of provisional licenses, as necessary. Without this rule's quick promulgation, that statutory mandate would be in jeopardy.

- 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 this rule in terms of whether it helps the Commission meet the General Assembly's required start date, while still ensuring the market's integrity. This can be done in a few ways, including evaluating whether licenses were able to be issued to appropriate and suitable persons by the required date. Additionally, the Commission will be evaluating whether the public benefit of implementing and enforcing this rule outweighs their administrative and business costs. And second, through analyzing the regulated community's comments about requests for amendments to the rules or for waivers or variances to or from the rules.

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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.

Even before the passage of House Bill 29 on December 8, 2021, the Commission took several steps to engage with the stakeholder community regarding the sports gaming market and the development of potential regulations. This included several meetings, phone calls, and emails, exchanged with several different stakeholders, ranging from sports teams, Ohio's current casinos and racinos, sportsbook operators, small retail establishments, vendors and suppliers in the space, and—most importantly—Ohio's general citizenry.

This continued on after the passage of House Bill 29, where the Commission then further engaged and provided information to stakeholders through more formal means. Soon after the bill's passage, the Commission created its [sports gaming webpage](#), where it posts relevant information related to sports gaming for all members of the public of see, including its draft rules, FAQs, and presentations it has made to the Commission, explaining both HB 29 and the process the Commission will use to implement the sports gaming regulations. Moreover, this website is not something stakeholders have to proactively check for updates, the Commission has created a [sports gaming listserv](#) to ensure all interested parties can be notified when the Commission posts new drafts of rules or new information on sports gaming. The link to the listserv is publicly available on the Commission's website. To help build this listserv, the Commission also sent emails to its casino gaming and fantasy sports listservs, notifying those stakeholders (of which the Commission expects significant cross pollination) of the new sports gaming-specific listserv and how to sign up. All of these outreach efforts have led to additional calls, emails, and meetings, regarding the Commission's draft regulations.

Using the listserv and website posting, the Commission is currently sending out each batch of rules for two rounds of informal stakeholder comment. In between each round staff is compiling and reviewing all comments received. These comments are then held up against House Bill 29 and evaluated based on whether they comport with the statute, help ensure the

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integrity of sports gaming, and whether any potential business impact of the rules or comments are justified. Changes made between rounds are redlined for stakeholders, so they can see the results of a comment round. The Commission plans to continue this pattern for stakeholders, allowing ample feedback from stakeholders even before the formal process starts with CSI while still moving quickly to accomplish a sports gaming market launch ahead of the January 1, 2023, mandate.

In reviewing this specific rule, the Commission's website was updated and an email was sent on December 27, 2021, to the Commission's sports gaming, fantasy sports, and casino gaming listservs. (Exhibits 1-6). Stakeholders were asked to submit any written comments on this rule by 5:00 p.m. on January 7, 2022. (Exhibits 1, 3, and 5). These stakeholders included employees or representatives from sports teams, casinos, racinos, small retail establishments, sportsbooks, suppliers, testing laboratories, integrity monitors, and general Ohio citizens. As discussed above, this first round of comments were reviewed by staff, changes were made and redlines, and the rule was sent back out to stakeholders. This second round sent out on January 18, 2022, to the Commission's sports gaming listserv, with comments due by 5:00 p.m. on January 28, 2022. (Exhibits 7-8). Again, staff reviewed all comments, made any relevant changes, and the rules were then prepared to begin the formal filing process, including consideration at a public meeting on February 16, 2022.

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 on this rule. While other rules in this batch have received stakeholder comment, those will be filed separately from this rule. All changes from the original version of the rule were made at the suggestion of Commission staff.

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 this rule because no scientific data was necessary to develop or measure their outcomes. Instead, Commission staff reviewed the Commission's statutory mandates and looked at how other jurisdictions approached this issue. This included several jurisdictions stakeholders themselves recommended to the Commission, including New Jersey, Arizona, Colorado, Michigan, Indiana, and Illinois. Additionally, as outlined above, staff also reviewed, considered, and used the comments of stakeholders in developing this rule. In so doing, the Commission was able to use, as much as possible, rules the regulated community is accustomed to in other jurisdictions, with minor adaptations to remain in compliance with Ohio law and the Commission's general procedures.

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?

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Commission staff carefully reviewed and considered the statutes and rules adopted in other jurisdictions, in particular those jurisdictions listed in Question 11. In reviewing these statutes and rules, staff considered past practices of the Commission in its other regulatory frameworks, any stakeholder comments, and the current trends in the sports gaming regulatory environment. As such, these rules are a conglomeration of the rules used in other jurisdictions with adaptations made for Ohio law and current industry trends.

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.

This rule is a licensing rule and thus is largely constrained by the statutory factors laid out by the General Assembly, including reviews of a person's eligibility, suitability, and their economic development to Ohio. To that end, the rules are performance-based in the sense that the Commission will look at an entity's past and present actions to decide whether a license is warranted under the circumstances. As required by the law, the Commission will consider the past and present performance of persons engaged in sports gaming and their ability to comply with the law in making licensing determinations.

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

This question largely does not apply to this rule because no other regulations in these areas currently exist with respect to sports gaming. However, the Commission has reached out to and is working closely with several of the other named agencies in House Bill 29 to ensure that the Commission is not promulgating rules or standards that conflict with or encroach upon the regulatory authority of other Ohio agencies, in particular the Lottery Commission. The Commission will continue to do so as the sports gaming rules make their way through the process.

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.

This rule relates to the provisional licensing of all sports gaming license types, which is handled by the Commission's licensing staff, which is overseen by a single director in the Commission's central office. Any issues that arise in the license-review process are brought to the attention of the Executive Director and Commission Legal staff, so that the agency and its division directors can coordinate a consistent response and conduct any needed outreach to the regulated community. Further, the granting of any provisional license is to be made by the Executive Director, at the recommendation of staff. Moreover, any issuance of an ultimate plenary license, a denial of a plenary license, or any sanctioning of these license types must be brought before the Commission at a public meeting for a vote. Therefore, the regulated community can expect consistent and transparent licensing decisions.

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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 regulated business community consists of all persons who may apply for a sports gaming proprietor, services provider, supplier, or type C gaming host license. These include Ohio's professional sports teams and events, casinos, and racinos, as well as small retail establishments, gaming-related supply or service companies, and sportsbook operators.

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

The nature of the potential adverse impact from this rule includes the application fees for proprietors, services providers, suppliers, hosts, and sports gaming employees. In addition to these fees, which are credited to the cost of a plenary license, the applicant will incur administrative costs related to the submission of applications. As such, each applicant may face costs for employee time and payroll, as well as potential fines for noncompliance.

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.

3775-4-99 Provisional licenses. (new)

This rule's expected business impact results from the rule's application fees and the employee time and payroll necessary to complete the application, provisional request, and respond to Commission follow-up. The fees vary depending upon the application type from \$15,000 for all types of sports gaming proprietors to \$150 for sports gaming employees—this stair-stepped fee structure is an acknowledgement of the different levels of background necessary to ensure the integrity of sports gaming and to ensure all statutory factors are met. All fees are ultimately credited to an applicant's plenary application or license fee and all provisional applicants must also seek a plenary license to be eligible to be issued a provisional one—essentially eliminating the fee's business impact. The employee time and payroll will also vary greatly by the license type sought by each applicant, as dictated by the various statutory factors the General Assembly set out for each type. *See* R.C. 3772.03-3772.09. Given these detailed statutory factors, this employee time and payroll cost is also justified.

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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 House Bill 29 requires the Commission to ensure the integrity of sports gaming, specifically by licensing and ensuring certain other minimum standards for conducting sports gaming are met. Many of these minimum eligibility considerations and licensing factors are specifically laid out by House Bill 29. R.C. 3775.03-3775.09. House Bill 29 also explicitly contemplates the existence and use of provisional licenses and of provisional application fees (and provisional license fees, although the Commission adopted none) in the initial stand up of sports gaming by the required start date.

Moreover, the regulatory intent justifies any adverse impact because sports gaming is a highly regulated industry and is accustomed to detailed regulations in every jurisdiction. 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 in consultation with the regulated community. For a more detailed analysis of the individual justifications applicable to this specific rule, please see the answer given in 16.c.

Regulatory Flexibility

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

This question is not applicable to rule, as this rule is a licensing rule using established criteria of the General Assembly. However, this rule does recognize the vast differences in potential businesses in this state from sports teams, casinos, and sportsbooks to small bars and taverns across the state. As such, the fees, considerations for licensure, and information collected in an application scale based on the types of business likely to apply for each license type. As the Commission establishes substantive rules for sports gaming, it will ensure that the compliance provisions contain acknowledgements of the differences in these business types as well as alternative means of compliance for small businesses, including both waivers and variances.

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 applies to this rule because R.C. 119.14 is not applicable to requirements for obtaining a license, the Commission will adhere to the statutory requirements thereunder, if applicable.

To the extent R.C. 119.14 would apply to a violation of this rule, the Commission will provide verbal and written notification to the small business to correct the paperwork violation.

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Thereafter, the Commission would allow the small business a reasonable amount of 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 licensure 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 regulate sports gaming effectively and efficiently 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 fax number: (614) 485-1007
- Commission's sports gaming webpage:
<https://casinocontrol.ohio.gov/sportsgaming.aspx>, including [FAQs](#), [staff's presentation](#) on HB 29 and the rule making process, and all currently available draft regulations.
- Commission's email: info@casinocontrol.ohio.gov
- Commission's sports gaming listserv:
<https://casinocontrol.ohio.gov/sportsgaming.aspx>

Cox, William

From: Ohio Casino Control Commission <Jessica.franks@casinocontrol.ohio.gov>
Sent: Monday, December 27, 2021 12:59 PM
To: Cox, William
Subject: Sports Gaming Rule for Comment

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OHIO CASINO CONTROL COMMISSION

Casino Gaming Stakeholders,

The Commission is sending out its first batch of sports gaming rules for comment. Because the Commission believes there is some overlap between its casino gaming and sports gaming stakeholders, it is also sending the rules out to this listserv. However, please note that after this, the Commission will be sending all sports gaming rules and other notifications out only through the sports gaming listserv. As such, if you would like to continue to receive these messages, please sign up [here](#).

As outlined in the Commission's [original sports gaming presentation](#), rules are being batched out according to subject matter and stakeholders will have the opportunity to review and comment on rules twice before the formal statutory process starts. The rules being provided for comment in this set concern general provisions, provisional licensing, independent testing laboratories, and integrity monitoring providers.

The proposed versions of those rules can be found [here](#).

Please feel free to forward this communication to anyone else you think may be

interested in these rules. If you would like to unsubscribe from this listserv, you may do so using the link located at the bottom of this email.

If after reading and reviewing these rules you would like to provide written comments, please email them to rulecomments@casinocontrol.ohio.gov by **January 7 at 5:00 PM.**

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



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Cox, William

From: Ohio Casino Control Commission <communications@casinocontrol.ohio.gov>
Sent: Monday, December 27, 2021 1:02 PM
To: Cox, William
Subject: Sports Gaming Rules for Comment

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OHIO CASINO CONTROL COMMISSION

Sports Gaming Stakeholders,

The Commission is sending out its first batch of sports gaming for comment. As outlined in the Commission's [original sports gaming presentation](#), rules are being batched out according to subject matter and stakeholders will have the opportunity to review and comment on rules twice before the formal statutory process starts. The rules being provided for comment in this set concern general provisions, provisional licensing, independent testing laboratories, and integrity monitoring providers.

The proposed versions of those rules can be found [here](#).

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 sports-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.

If after reading and reviewing these rules you would like to provide written comments, please email them to rulecomments@casinocontrol.ohio.gov by **January 7 at 5:00 PM.**

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



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Cox, William

From: Ohio Casino Control Commission <Jessica.Franks@casinocontrol.ohio.gov>
Sent: Tuesday, January 18, 2022 8:44 AM
To: Cox, William
Subject: Sports Gaming Rules for Comment

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OHIO CASINO CONTROL COMMISSION

Sports Gaming Stakeholders,

The Commission is sending the first batch of sports gaming rules for a second round of stakeholder comments. The rules being provided for comment in this set concern general provisions, provisional licensing, independent testing laboratories, and integrity monitoring providers and were provided to stakeholders on December 28, 2021. The Commission has made changes to these rules, based upon feedback received from stakeholders. Added language is underlined and deletions are ~~stricken~~. Changes to formatting or organization are not denoted.

The proposed versions of those rules can be found [here](#).

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 sports-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.

If after reading and reviewing these rules you would like to provide written comments, please email them to rulecomments@casinocontrol.ohio.gov by **January 28 at 5:00 PM.**

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



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