



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: Andromeda Morrison, 614-387-5616,
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Regulation/Package Title (a general description of the rules' substantive content):

Licensing Rules Changes

Rule Number(s): 3772-3-01 (amendment), 3772-4-01 (amendment), 3772-4-02 (rescind),
3772-4-06 (amendment), and 3772-7-01(amendment)

Date of Submission for CSI Review: 7/2/2024

Public Comment Period End Date: 7/16/2024

Rule Type/Number of Rules:

New/___ rules

No Change/___ rules (FYR? ___)

Amended/ 4 rules (FYR? No)

Rescinded/ 1 rule (FYR? No)

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.

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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.

The rules presented here are being reviewed pursuant to the Commission's duty to reduce regulatory restrictions in S.B. 9 of the 134th General Assembly and R.C. 121.95, and consist of rules regulating licensing in Ohio Adm.Code 3772-3-01, 3772-4-01, 3772-4-02, 3772-4-06, and 3772-7-01. Many of the revisions are meant to improve clarity or readability and reduce redundancies in and between the Administrative and Revised Codes. In addition, certain regulatory restrictions, and one rule, are being removed to comply with the restriction reduction requirements of S.B. 9 of the 134th General Assembly.

- **3772-3-01 (amendment)**, titled "Institutional investor suitability or qualification." The rule provides the process by which an entity can be presumed to be suitable or qualified as an institutional investor, which involves the entity submitting documentation sufficient to establish qualifications as an institutional investor, a completed certification form, and submission of any other records required by the Commission. The purpose of this rule is to ensure that R.C. 3772.01-defined institutional investors are compliant with both that definition and the statutory suitability and qualification standards in R.C. 3772.10. The amendment to this rule removes a regulatory restriction and the inherent requirement that an entity is responsible for its own application costs.

- **3772-4-01 (amendment)**, titled “Instructions for the casino operator, management company, and holding company license application.” This rule provides detailed instructions, terms, and conditions for these entities to follow to complete an application. The purpose of this rule is to provide clear instructions and expectations to operators, management companies, and holding companies for how to complete and file an application. The rule is being amended to remove certain regulatory restrictions and redundancies. For example, the rule removes the requirement that an applicant must submit a complete and legible application for a license.
 - **3772-4-02 (rescind)**, titled “Information that must be provided.” The rule specifies the substantive information that must be provided to the Commission for the issuance of an operator license. This rule is being rescinded to remove regulatory restrictions and reduce redundancy, as the rule is encompassed by R.C. 3772.11.
 - **3774-4-06 (amendment)**, titled “Duty to update information.” This rule requires casino operators, management companies, and holding companies to update the Commission on information that has changed from the time of application that would affect the entity’s suitability for licensure. The purpose of this rule is to ensure that the Commission is aware of all circumstances that may affect an entity’s suitability for continued licensure. The amendment removes a regulatory restriction and eliminates redundancy, as it is required in the application and the applicant has the duty to provide a complete application pursuant to the Revised Code.
 - **3772-7-01 (amendment)**, titled “Insurance.” This rule requires casino operators, management companies, holding companies, and gaming-related vendors to obtain and maintain insurance, as required by the Commission. The purpose of this rule is to ensure all covered entities, and therefore the State of Ohio, are adequately protected from unexpected events. Additionally, the rule is required by statutory sections, including R.C. 3772.03 and 3772.10. The amendment to the rule removes specific types of insurance which the Commission may still deem necessary pursuant to the rule.
- 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. 3772.01, 3772.03, 3772.033, 3772.07, 3772.09, 3772.10, 3772.11, 3772.111, 3772.121, 3772.13, 3772.131, & 3772.18

- 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 implements a federal requirement, but includes provisions not specifically required by the federal government, please explain the rationale for exceeding the federal requirement.**

This question does not apply to these rules because the federal government does not regulate casino gaming in this state. 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 licensing key employees (*see, e.g., R.C. 3772.13*), gaming-related vendors (*see, e.g., R.C. 3772.12 and 3772.121*), and casino gaming employees (*see, e.g., R.C. 3772.131*), and ensuring the suitability of institutional investors (*see, e.g., R.C. 3772.10(E)*). To ensure the integrity of casino gaming, it is imperative to protect casino patrons and to ensure that all casino employees and gaming-related vendors meet the requirements for licensure to conduct casino gaming in the state of Ohio. (*See, e.g., R.C. 3772.10*). These rules and their amendments are designed to continue to effectuate this constitutional and statutory mandate.

- 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 these amended rules in terms of whether they help to ensure the integrity of casino gaming. This can be done in two ways: First, through evaluating whether the administrative cost of implementing and enforcing the proposed rules outweighs their public benefit. 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 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 25, 2024, to stakeholders. (Exhibits 1 and 2). Stakeholders were asked to submit any written comments on the rules by 5:00 p.m. on May 9, 2024. (Exhibit 1). These stakeholders included employees or 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 June 18, 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 rule 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 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.

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?

Alternative regulations may include performance-based regulations, which define the required outcome, but do not dictate the process the regulated stakeholders must use to comply.

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. 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 these areas 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 Administrative Code requirements adopted thereunder.

14. 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 largely relate to licensing, which is handled by the Commission's licensing and investigations divisions, which are overseen by directors in the Commission's central office. Further, to ensure ongoing compliance, there are gaming agents, auditors, and office managers stationed at each of the casinos observing, evaluating, and investigating casino operations. Any issues that arise at the facilities are funneled to the Commission's central office where the Executive Director and his division directors can coordinate a consistent response and conduct outreach to the regulated community. Further, the granting or ultimate sanctioning of any 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.

Adverse Impact to Business

15. Provide a summary of the estimated cost of compliance with the rule(s). 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 institutional investors.

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

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.

Overall, the nature and potential adverse impact from these amendments includes the cost of each application and license fee for initial, new, and renewal key employees, and gaming-related vendors. In addition to these fees, key employees, and gaming-related vendors, as well institutional investors, will incur administrative costs related to the submission of applications or certifications. As such, each casino operator, management

company, holding company, gaming-related vendor, or institutional investor may face costs for employee time and payroll.

3772-3-01 Institutional investor suitability or qualification. (amend)

The Commission anticipates a minimal adverse business impact from this rule relating to the submission of information to the Commission. The rule is largely unchanged and implements a statutory requirement that the Commission find institutional investors compliant with their R.C. 3772.01 definition and R.C. 3772.10 qualification standards. Moreover, these standards are common in casino gaming jurisdictions. Because this rule simply implements statutory requirements that exist in other jurisdictions, the Commission only anticipates a minimal adverse impact.

3772-4-01 Instructions for casino owner/operator/management company/holding company license application. (amend)

The costs from this rule are employee time and payroll to comply with the application instructions. However, these requirements or instructions are either common to the industry or already required in statute, namely R.C. 3772.07, 3772.10, 3772.11, and 3772.111. Further, the Commission is specifically charged with adopting a rule on this point in R.C. 3772.03(D)(2). Moreover, this amendment eliminates certain inherent requirements, like requiring applicants to comply with all conditions set forth by the Commission for licensure. Therefore, the Commission anticipates minimal adverse impact.

3772-4-02 Information that must be provided. (rescind)

This rule is being rescinded because all required information can be requested on the application and does not need to be duplicitously requested in a rule. Therefore, there is little business impact from this rescission.

3772-4-06 Duty to update information. (amend)

The business impact of this rule is the employee time and payroll necessary to submit these materials to the Commission, which will vary based on the type of the information that must be submitted. However, the business impact is minimized since the statute requires licensees to maintain suitability and requires the Commission to observe licensees to ensure they are suitable throughout licensure. R.C. 3772.10. Moreover, providing suitability updates is common in the casino industry in every jurisdiction in which they operate. Because of this, the operators already have dedicated staff to ensure these continuing reporting requirements are met in each jurisdiction. Therefore, the cost to the operator submitting this material is nominal, built into their business model, and contemplated by statute.

3772-7-01 Insurance. (amendment)

The Commission does not anticipate an adverse impact from this rule, which is statutorily required by R.C. 3772.03 and 3772.10, and even without this statutory mandate, common

business and industry practice dictates that entities would purchase these insurance policies anyway. Moreover, this insurance purchase is made from other private-sector businesses. The amendment actually reduces what insurance is required by rule while still providing the Commission the ability to request certain types of insurance as necessary in the future. Therefore, the Commission does not anticipate an adverse impact.

16. Are there any proposed changes to the rules that will reduce a regulatory burden imposed on the business community? Please identify. (*Reductions in regulatory burden may include streamlining reporting processes, simplifying rules to improve readability, eliminating requirements, reducing compliance time or fees, or other related factors*).

3772-3-01 Institutional investor suitability or qualification. (amend)

The amendment removes the inherent requirement that the cost of an application is borne solely by the applicant. This change is made to reduce the number of regulatory restrictions pursuant to S.B. 9 of the 134th General Assembly. It will therefore remove a stated rule for the business community.

3772-4-01 Instructions for casino owner/operator/management company/holding company license application. (amend)

The amendment removes details for applications that are either inherent requirements of the applications or can be set forth in the documents for the application itself. The changes are also made to reduce the number of regulatory restrictions pursuant to S.B. 9 of the 134th General Assembly. It will therefore remove several duplicative rules for the business community.

3772-4-02 Information that must be provided. (rescind)

The rescission removes an entire rule from the regulatory community, thereby streamlining the requirements imposed during licensure and consolidating those regulatory burdens. The change is also made to reduce the number of regulatory restrictions pursuant to S.B. 9 of the 134th General Assembly.

3772-4-06 Duty to update information. (amend)

The amendment removes a rule that requires an action that the business community already takes. The change is also made to reduce the number of regulatory restrictions pursuant to S.B. 9 of the 134th General Assembly. It will therefore remove a regulatory burden imposed on the business community.

3772-7-01 Insurance. (amendment)

The amendment reduces a regulatory burden on business by no longer requiring two specific types of insurance.

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 licensing and ensuring certain other minimum standards for operators are met. 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, starting with its own internal management and licensing rules covering operators, management companies, and holding companies. Finally, each of the amendments in this package further lessens any business impact, including removing redundant provisions of law. 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 only impact businesses in the casino industry, 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.

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 only impact businesses in the casino industry, 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 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 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 Street, 20th Floor, Columbus, Ohio 43215
- Commission's toll free telephone number: (855) 800-0058
- Commission's fax number: (614) 485-1007
- Commission's website: <http://www.casinocontrol.ohio.gov/>
- Commission's email: info@casinocontrol.ohio.gov and
- 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 3772-1-05, request waivers and variances from Commission regulations.

EXHIBIT 1

From: Ohio Casino Control Commission <Jessica.franks@casinocontrol.ohio.gov>
Sent: Thursday, April 25, 2024 4:17 PM
To: Abbott, Catharine <Caty.Abbott@casinocontrol.ohio.gov>
Subject: Casino Gaming Rules for Comment

[View this email in your browser](#)

Casino Gaming Stakeholders,

As part of the Ohio Casino Control Commission's ("Commission") efforts to carefully review casino gaming regulations, the Commission is putting forward 4 proposed rule amendments: Ohio Adm. Code 3772-3-01, 3772-4-01, 3772-4-06, and 3772-7-01, as well as one proposed rule rescission: 3772-4-02, for stakeholder comment. The proposed versions of those 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. 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 at your earliest convenience. If, in the end, you would like to provide formal written comments, please email them to rulecomments@casinocontrol.ohio.gov **by 5:00 PM on May 9, 2024**.

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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