

Principles for Casino Gaming Payments Modernization



As state and tribal leaders consider modernizing casino gaming payment options, the industry will champion common-sense policies that encourage payment choice, protect consumers, and keep pace with consumer expectations.

PRINCIPLE:

Equip customers with more tools to wager responsibly.

PROPOSAL:

Customers should be provided the options they need to set spending limits and monitor their spending and gaming patterns via digital payment platforms.

RATIONALE:

Modern payment options can equip customers with digital tools to help them monitor their gaming and set spending limits. The more customers are empowered to self-monitor and govern their own spending and gaming behavior, the better. Digital payment platforms can provide robust tools that enable customers to wager responsibly.

PRINCIPLE:

Ensure state laws enable a flexible regulatory approach, capable of keeping pace with evolving forms of digital payments.

PROPOSAL:

Legislators should craft relevant statutes broadly to allow regulators the flexibility necessary to interpret, implement, and update rules governing payments in gaming.

RATIONALE:

Overly proscriptive or inflexible statutes can prevent policymakers from adapting to a dynamic market. Even the most knowledgeable regulator or legislator will struggle keeping pace with technology breakthroughs and payment innovations. Consumer tastes and preferences also evolve in rapid and unpredictable ways. Therefore, lawmakers should craft legislation that establishes broad guardrails around digital payments and provides regulators—who are closer to changing marketplace realities—the latitude and flexibility necessary to design and oversee rules governing digital payments in gaming.

PRINCIPLE:

Give customers payment choice and convenience.

PROPOSAL:

Allow customers to make gaming and non-gaming transactions in a form that is convenient and gives them a choice, for example: credit cards, debit cards, or debit-enabled forms of payment such as mobile payment apps, player reward cards, or digital wallets connected to debit/bank accounts. The ability for patrons to utilize their preferred form of payment will reduce the current friction between gaming and non-gaming segments of an integrated resort and will help customers enjoy a more seamless experience. Forms of payment must adhere to robust, uniform data privacy and security requirements.

RATIONALE: Gaming is a source of mainstream entertainment, and consumers expect to pay in the same way they pay for a show ticket or restaurant meal. Increasingly, this means with a credit or debit card. Phone based “wallet” apps are among a host of successful payment innovations currently used at some casinos and resorts, as well as entertainment venues around the world. Customers choose their own payment method for convenience, control, and portability—and to avoid carrying large amounts of cash. As businesses compete to provide customers with a more convenient, seamless experience, payment innovations will also help to identify problem gambling behavior and enhance law enforcement’s ability to identify and stop illegal activity.

PRINCIPLE: Address heightened customer public health concerns.

PROPOSAL: Enable gaming companies to incorporate digital payment options into operational best practices amid the COVID-19 pandemic. Any customers uneasy about using cash on the gaming floor due to health or safety concerns should have an alternate payment option available to them.

RATIONALE: In a heightened public health environment, consumers want to use the payment choice that makes them most comfortable. Consumer concerns about handling cash could persist beyond the COVID-19 pandemic. The Centers for Disease Control and Prevention and state agencies recently issued guidelines and regulations to encourage contactless payments as a public health priority for American businesses. By providing gaming patrons with digital payment choices operators can foster greater customer confidence, enabling customers to enjoy their experience using the payment option they prefer.

PRINCIPLE: Provide customers confidence in digital payment security.

PROPOSAL: Make sure payment card providers comply with well-established financial institution security and data-protection standards. These uniform standards should apply across all relevant jurisdictions.

RATIONALE: Customers should feel confident in the security of digital gaming transactions regardless of the gaming environment or physical jurisdiction. Financial institution governing bodies (e.g., PCI Security Standards Council, National Automated Clearing House Association) have already established well-defined standards and practices to which payment card providers must adhere. Regulators should ensure payment card providers in the casino gaming industry comply with these standards and practices, which will give customers greater confidence that their gaming transactions are secure regardless of their form of payment.

PRINCIPLE: Create a uniform regulatory environment for casino operators, suppliers, and regulators.

PROPOSAL: Applicable state and tribal regulations regarding digital payments should align with relevant federal regulations. This is particularly important with regard to regulations related to anti-money laundering, wire or money transfers, or tax-related issues.



RATIONALE: The widespread adoption of digital payments in gaming will enable better regulatory oversight and improved Know Your Customer and anti-money laundering capabilities, even as it enhances the gaming experience for customers. Ensuring state and federal regulations are aligned eliminates complexity, simplifies industry compliance, and makes it easier for regulators to oversee a consistent, transparent framework.

PRINCIPLE: Empower law enforcement to better identify offenders through digital payment analysis.

PROPOSAL: Reduce the overwhelming number of currency transaction reports (CTR) forms from the gaming industry by allowing customers to use modern payment methods. Shifting from cash-based payments to digital transaction networks creates transparency and enables the gaming industry and law enforcement partners to focus on the highest-risk patrons, allowing authorities to more easily obtain and analyze relevant evidence.

RATIONALE: The casino industry is viewed as a model for other industries in its efforts to combat money laundering. Creating new payment options for customers provides law enforcement additional insights into sources of funds and customer backgrounds; it also reduces the time law enforcement spends on lower-risk patrons.