

Small Business Economic Impact Statement

Chapter 230-23 WAC

Rules Concerning
Implementation of a
Statewide Self-
Exclusion Program

August 6, 2021

SECTION 1:

Describe the proposed rule, including: a brief history of the issue; an explanation of why the proposed rule is needed; and a brief description of the probable compliance requirements and the kinds of professional services that a small business is likely to need in order to comply with the proposed rule.

The legislature recognizes that some individuals in this state have a gambling problem or gambling disorder. Because the state promotes and regulates gambling through the activities of the state lottery commission, the Washington horse racing commission, and the Washington state gambling commission, the state has the responsibility to continue to provide resources for the support of services for gambling disorders (RCW 9.46.071).

Currently, each house-banked card room licensee is required by RCW 9.46.071(1)(b) to post informational gambling disorder signs including a toll-free hotline number for individuals with a gambling disorder. Additionally, several house-banked card room licensees operate their own in-house self-exclusion programs.

On April 30, 2020, Governor Inslee signed HB 1302, which charges the Gambling Commission with developing rules for a centralized, statewide self-exclusion program. HB 1302 also requires a process for all federally recognized Indian tribes or tribal enterprises that own gambling operations or facilities with Class III gaming compacts to voluntarily participate in the self-exclusion program.

Research suggests that self-exclusion programs allowing individuals to exclude themselves from multiple gambling locations using a single process have a higher rate of success. A centralized, statewide program administered by the Commission, rather than the existing individual operator-level approach, will be more accessible to individuals with gambling disorders and allow them to exclude themselves from multiple facilities without having to enter multiple facilities.

The proposed chapter, Chapter 230-23 WAC, Self-exclusion, creates a program that will allow an individual to voluntarily request to be self-excluded from each house-banked card room licensee and participating tribal gaming facility at a single location rather than having to go to each location to enroll in an individual program like they are currently doing.

In order to comply with the new chapter, house-banked card room game licensees will need to transition from their individual operator-level programs to the centralized, statewide program administered by the Gambling Commission. This will entail:

- (1) Making the Self-Exclusion Request Form, developed and provided by the Gambling Commission, available to all patrons.
- (2) Accepting forms from individuals interested in enrolling in the program, including:
 - (a) Reviewing forms for completeness,
 - (b) Verifying the individual's identity either with a driver's license or other acceptable valid form of identification,
 - (c) Verifying the individual has selected a period of time of enrollment for the self-exclusion program, and

- (d) Verifying the individual has signed the form, and
 - (e) Taking a photograph of the individual, showing only their head and shoulders, to submit with the Self-Exclusion Request Form.
- (3) Forwarding the completed form to the Gambling Commission within 72 hours of receiving it either by email, regular mail, or fax.
- (4) Providing the individual with information and resources for treatment of gambling disorders upon enrollment.
- (5) Designating an employee(s) to be the contact person for the purposes of the self-exclusion program, including:
- (a) Receipt and maintenance of the self-exclusion list. This includes retrieving an updated list from Secure Access Washington (SAW) within 48 hours of receiving notification from us that an updated list exists;
 - (b) Submitting self-exclusion procedures to the Gambling Commission, and
 - (c) Communicating with the Gambling Commission in regard to the self-exclusion program.
- (6) Taking steps to remove individuals who breach their enrollment in the self-exclusion program by entering a house-banked card room upon discovery, including:
- (a) Immediately removing the individual from the premises,
 - (b) Confiscating all money and things of value, such as gaming chips, obtained or owed to the individual as a result of prohibited wagers, and
 - (c) Notifying the Gambling Commission of the breach within 72 hours.
- (7) Training all new employees within 3 days of hire, and annually retraining all employees who directly interact with gaming patrons on:
- (a) Information concerning the nature of problem gambling,
 - (b) Procedures for requesting self-exclusion, and
 - (c) How to assist patrons in obtaining information about gambling disorder treatment programs.
- (8) Notifying individuals already participating in existing operator-level programs that the centralized, statewide self-exclusion program exists within 3 days of the effective date of Chapter 230-23 WAC, including:
- (a) Making the Self-Exclusion Request Form available to them, and
 - (b) Providing information on how they can participate.
- (9) Establishing procedures for our review and approval, including:
- (a) Utilizing player tracking systems and all other electronic means, including checking all taxable patron winnings against the self-exclusion list, to assist in determining whether or not an individual who is enrolled in the program has engaged in gambling activities,
 - (b) Closing player club memberships and/or accounts for individuals enrolled in the

program,

(c) Denying check cashing privileges, player club memberships, complementary goods and services, and similar privileges and/or benefits to individuals enrolled in the program,

(d) Ensuring individuals enrolled in the program do not receive targeted mailings, telemarketing promotions, player club materials, or any other promotional materials related to gaming,

(e) Verifying patrons who win jackpot prizes are not individuals enrolled in the program before paying out prizes,

(f) Ensuring individuals enrolled in the program are not gambling at their establishment,

(g) Ensuring the confidentiality of individuals enrolled in the program, and

(h) Collecting moneys or things of value obtained or owed to individuals enrolled in the program as a result of participating in a gambling activity, including:

(i) Issuing a check for the same monetary value obtained or owed within 3 business days to either the problem gambling account created in RCW 41.05.751 and/or a charitable or nonprofit organization that provides services or increases awareness about gambling disorders, and

(ii) Documenting and retaining for one year:

(A) Any surveillance evidence identifying the date, time, and amount of money or things of value confiscated, the name and identity verification of the individual enrolled in the program, and

(B) A copy of the canceled check remitting the confiscated funds.

Licensees will likely make the transition to the statewide self-exclusion program using existing staff and resources and are unlikely to contract with any professional services in order to comply with the proposed rules.

SECTION 2:

Identify which businesses are required to comply with the proposed rule using the North American Industry Classification System (NAICS) codes and what the minor cost thresholds are.

Table A: Calculation of Minor Cost Thresholds.

NAICS Code	NAICS Business Description	# of businesses in WA*	Minor Cost Threshold = 1% of Average Annual Payroll**	Minor Cost Threshold = .3% of Average Annual Receipts***
713210	Casinos; except casino hotels	4	\$51,811.19	\$29,565.63
713290	Other gambling industries	39	\$33,690.22	\$10,126.91

*Number taken from 2018 Washington State Employment Security Department

(<https://esd.wa.gov/labormarketinfo/report-library>)

**2018 dataset taken from United States Bureau of Labor Statistics.

***2018 dataset taken from Washington State Department of Revenue.

NAICS Code Descriptions:

713210- Casinos; except casino hotels: This industry comprises establishments primarily engaged in operating gambling facilities that offer table wagering games along with other gambling activities, such as slot machines, sports betting, and off-track betting. These establishments often provide food and beverage services.

713290- Other gambling industries: This industry comprises establishments primarily engaged in operating gambling facilities (except casinos or casino hotels) or providing gambling services. This industry includes card rooms.

NAICS Code Descriptions were obtained from the NAICS Association. NAICS Code 713210 includes house-banked card rooms that offer off-track betting, which explains why average annual payroll and average annual receipts are higher than NAICS Code 713290 which includes all the other house-banked card rooms in the state, which do not offer off-track betting.

This new chapter, chapter 230-23 WAC, will apply to all house-banked card rooms licensed in the state of Washington, to conduct gambling activities. Currently, there are 43 house-banked card rooms licensed with the Gambling Commission. "Minor cost" is defined in RCW 19.85.020(2) as a cost per business that is less than one percent of annual payroll or the greater of either 0.3 percent of annual revenue or \$100. For the purposes of this small business economic impact statement, the NAICS code 713290 data will be used as this code represents the majority of house-banked card rooms in the state (those that do not offer off-track betting). Therefore, the minor cost threshold to be used will be between \$10,126.91 and \$33,690.22.

SECTION 3:

Analyze the probable cost of compliance. Identify the probable costs to comply with the proposed rule, including: cost of equipment, supplies, labor, professional services and increased administrative costs; and whether compliance with the proposed rule will cause businesses to lose sales or revenue.

This new chapter, chapter 230-23 WAC, will allow an individual to voluntarily request to be self-excluded from each house-banked card room licensee and participating tribal gaming facility at a single location. Outlined below is the probable cost incurred by house-banked card room licensees to comply with the requirements of the new chapter.

An individual interested in enrolling in the program can do so by completing a Self-Exclusion Request Form and submitting it to either a house-banked card room licensee or to the Gambling Commission. The Self-Exclusion Request Form will be made available on the Gambling Commission's website. House-banked card room licensees will be responsible for printing off forms for individuals interested in enrolling the program. It is assumed that each licensee has a computer, printer, and internet access available to them as this is a common business practice. The cost of paper has been estimated at \$10.69 per ream.

Each licensee will be responsible for mailing a copy of the Self-Exclusion Request Form to individuals already enrolled in operator-level self-exclusion programs. As of December 2019, there were 1,118 individuals enrolled in self-exclusion programs around the state. Self-Exclusion Request Forms can be sent via regular mail. The cost of a stamp to mail an envelope via regular mail is \$0.55. The cost of envelopes has been estimated at \$9.19 per box of 100 and paper at \$10.69 per ream. It can be assumed that each licensee will have to purchase paper, envelopes, and stamps. As of July 2021, there were 43 house-banked card room licensees. The total cost to comply with this section of the chapter will cost at least \$1,469.74. This cost will be shared amongst licensees, but disproportionately, as some licensees may have more individuals enrolled in operator-level programs than others.

Individuals interested in enrolling in the self-exclusion program may submit Self-Exclusion Request Forms to any house-banked card room. Licensees will be responsible for reviewing forms submitted to their establishment for completeness, verifying proof of identity, verifying the period of enrollment, and verifying the signature of the individual wishing to enroll in the program. Licensees will also be required to take a photograph of the individual, showing only their head and shoulders, to submit with the Self-Exclusion Request Form. Exceptions will be made if the individual submits a photograph with their Self-Exclusion Request Form, similar to that of a passport headshot. Licensees will have 72 hours to forward completed forms to the Gambling Commission. This can be done by way of regular mail, email, or fax. It is estimated that reviewing the Self-Exclusion Request Form for completeness, verifying the identity of the individual, and taking their photograph will take one employee 10-15 minutes to complete. An hourly wage of \$16.69 was used to account for the highest minimum wage in the state, therefore, the estimated cost of one employee to process a Self-Exclusion Request Form will cost a minimum of \$4.18 per form. It is assumed that every licensee has access to a camera to take a photograph of the individual, showing only their head

and shoulders, as this may be done using a camera on a cellular phone, a digital camera, or a webcam. A cost of a stamp and envelope will be incurred if the form needs to be mailed, but the licensee may also scan and email a copy of the form, or fax it.

Licensees will be required to provide information and resources to individuals on treatment of gambling disorders, however, they are already doing this, so there is no anticipated cost associated with this requirement.

Each house-banked card room licensee will be responsible for developing procedures on how they plan to implement the self-exclusion program at their establishment and designating at least one employee to be the contact person for purposes of the self-exclusion program. The designated contact person will be responsible for receiving information regarding and maintaining the self-exclusion list, submitting the licensee's self-exclusion procedures to the Gambling Commission, and being the point-person for all communication with the Gambling Commission regarding the program. The Gambling Commission will develop a template for licensees to reference when developing procedures on implementing the self-exclusion program at their establishment. This will keep costs low and procedures consistent amongst licensees. Staff time to develop procedures consistent with the provided template is estimated to take 4-8 hours and will likely be developed by a higher-level position at the house-banked card room, such as a General Manager, so a rate of \$48 per hour was used, resulting in a maximum amount of \$384.00. It is assumed that the designated contact person will not be a full-time position, rather these duties will likely be incorporated into an existing position, and are estimated to require 1-2 hours per week, and cost a minimum of \$33.38.

Costs associated with implementing the procedures themselves are expected to be relatively low. Licensees will be responsible for ensuring the confidentiality of individuals enrolled in the self-exclusion program, ensuring that those individuals are not gambling at their establishments, and finally, ensuring that they are not marketing to individuals enrolled in the self-exclusion program.

It is not anticipated that ensuring confidentiality of individuals on the self-exclusion list will impose any costs to licensees. Once the Self-Exclusion Request Form is submitted to the Gambling Commission, individuals will be placed on the list for the period of enrollment they've selected, and it will be the responsibility of the designated contact person to maintain the list for each licensee. The manner in which the list is maintained will be determined by each licensee.

Ensuring individuals enrolled in the self-exclusion program do not gamble at licensed establishments will be accomplished in a number of ways including checking I.D.'s at the door, utilizing player tracking systems and other electronic means, comparing all taxable patron winnings with the self-exclusion list, and verifying identification prior to paying out jackpot prizes. Many licensees are already checking I.D.'s at the door to verify age, as this is common business practice. There may be a minimal cost associated with cross-referencing the name on an I.D. with the self-exclusion list. It is estimated this verification would take one employee less than 5 minutes to complete and therefore would have minimal costs associated with it. A majority of licensees (71%) use ABS Business Data, LLC's Sonoma player-tracking system. This system allows licensees to maintain customer information and create loyalty rewards programs, including sending emails and SMS messaging. For those licensees using Sonoma, or a similar system, it should be

relatively easy to flag any individual with a player-tracking card who enrolls in the self-exclusion program by updating their customer information. If an individual comes into the establishment and participates in gambling using their player-tracking card, the licensee will be aware. It is estimated that updating player-tracking information in a system such as Sonoma will take one employee 10-15 minutes, or \$4.18 per individual.

Taxable patron winnings, or at least \$600 and three hundred times the amount of the wager, are required to be reported to the IRS. Before these winnings can be claimed, patrons must fill out tax documents. It is estimated that it will require one employee less than 5 minutes to check the patrons name against the self-exclusion list while they complete the tax documents to claim their winnings, and therefore will have minimal costs associated with it.

Employees who work in the cage, or depending on the amount of prize, employees who work on the floor, will be responsible for confirming that patrons who win jackpot prizes are not enrolled in the program. This can be achieved by comparing the identification of all jackpot prize winners with those on the self-exclusion list prior to paying out prizes. This verification method is estimated to add less than 5 minutes on to an employee's time, and therefore will have minimal costs associated with it.

If an individual enrolled in the program breaches their enrollment, the licensee must immediately remove the individual from the premises upon discovery, confiscate all money and things of value obtained or owed to the individual as a result of prohibited wagers, and notify the Gambling Commission within 72 hours of the breach. There is no anticipated cost associated with removing individuals from the premises as this is already a practice that licensees have in place, however confiscating winnings is a new practice and will require training appropriate staff. This will require licensees to develop training materials which is estimated to take 2-4 hours and will likely be developed by a higher-level position at the house-banked card room, such as a General Manager, so a rate of \$48 per hour was used, resulting in a maximum of \$192. Training of appropriate staff can be incorporated into the overall training of the self-exclusion program which is calculated later in this document.

Upon confiscating all money and things of value obtained or owed to the enrolled individual, the licensee must issue a check for the same monetary value within 3 business days to either the problem gambling account created in RCW 41.05.751 and/or a charitable or nonprofit organization that provides services or increases awareness about gambling disorders. There are no anticipated costs for issuing confiscated winnings as required by statute.

Surveillance evidence of the breach identifying the date, time, amount of money or things of value confiscated, the name and identity verification of the individual enrolled in the program, and a copy of the canceled check remitting the confiscated funds must be retained for one year. This information may be stored electronically or via hard copy therefore the anticipated costs may vary.

Licensees will be required to deny check cashing privileges, close player club memberships and/or other accounts for individuals enrolled in the self-exclusion program, and remove these individuals from mailing lists to ensure they no longer receive targeted mailings. Employees who work in the cage will be responsible for denying check cashing

privileges to individuals enrolled in the self-exclusion program. This can be achieved by comparing the identification of those wishing to cash checks with those on the self-exclusion list. This verification method is estimated to add less than 5 minutes on to an employee's time, and therefore will have minimal costs associated with it.

According to ABS Business Data, LLC, most licensees (71%) are using Sonoma player-tracking system software. This system allows the licensee to update customer information and communicate directly with customers through email and SMS messaging, therefore it should be relatively easy to update the customer information to include that the individual is enrolled in the self-exclusion program and to disable email and SMS messaging. It is estimated this will take one employee 10-15 minutes to complete, or \$4.18 per individual. There is no cost associated with denying individuals enrolled in the self-exclusion program player club memberships, complimentary good and/or services, or any other privileges or benefits. If anything, denying complimentary goods and services may save licensees money.

House-banked card room licensees will be responsible for training all new employees within 3 days of hire and annually retraining all employees who directly interact with individuals who are gambling on information concerning the nature of gambling disorders, the procedures for individuals to request to be enrolled in the self-exclusion program, and on how to assist individuals in obtaining information about gambling disorder treatment programs. There are currently 4,096 persons employed at licensed house-banked card rooms. It is unlikely that all of these persons directly interact with individuals who are gambling, however, if all were to participate in a 4-hour training, it is estimated to cost a minimum of \$273,448.96. This cost would be divided amongst 43 licensed house-banked card rooms, disproportionately, as some have more employees than others. The cost to train each employee would cost a minimum of \$66.76. Averaging the amount of card room employees who were licensed between January and July 2021, it is estimated that 42 card room employees are hired every month, or just under 1 per licensed house-banked card room, therefore the cost of training new employees would be a minimum of \$66.76.

The proposed rules may result in a reduction of sales and/or revenue to house-banked card room licensees as individuals with gambling disorders will no longer be participating in gambling activities once enrolled in the self-exclusion program, however that is the purpose of the program and meets the intent of the law.

See *Table B. Cost of Compliance* on page 10 for more information.

Table B: Cost of Compliance.

Assumptions		Cost	
Computer		\$0	
Printer		\$0	
Internet		\$0	
Access to Camera (webcam/phone/digital camera)		\$0	
Supplies		Cost	
Paper	Self-Exclusion Request Form for already enrolled individuals (1,118)	\$10.69/ream (500 sheets)	
	Self-Exclusion Request Form (new individuals)		
	Copy of canceled check		
Stamps	Regular mail to already enrolled individuals (1,118)	\$0.55/stamp = \$614.90	
	Forwarding Self-Exclusion Forms via regular mail to Gambling Commission	\$0.55/stamp	
Envelopes	Sending Self-Exclusion forms to already enrolled individuals (1,118)	\$9.19/box (100 envelopes)	
	Forwarding Self-Exclusion forms via regular mail to Gambling Commission	\$9.19/box (100 envelopes)	
Record retention of surveillance evidence (thumb drive, CD, hard drive, computer, etc.)		\$7.49-10.93	
Labor		Time	Cost
Process forms (review for completeness, verify identity, verify period of enrollment, and verify signature)		10-15 minutes per form received	\$16.69/hour = \$4.18/form
Designated contact person/maintain self-exclusion list		1-2 hours/week	\$33.38/week
Develop self-exclusion procedures		4-8 hours	\$48/hour = \$384/licensee
Implementation of self-exclusion procedures	Ensuring confidentiality of individuals enrolled in the self-exclusion program	0 minutes	\$0
	Ensure individuals enrolled in the program are not gambling at their establishment (utilizing player tracking accounts, checking all taxable patron winnings, checking I.D.'s at the door, etc.)	15 minutes	\$16.69/hour = \$4.18/individual
	Close player club memberships/remove individuals from targeted mailings lists	10-15 minutes per individual	\$16.69/hours = \$4.18/individual
	Verification at cage when cashing checks and paying out jackpot prizes	Less than 5 minutes	\$0
	Denying complimentary goods and services	0 minutes	\$0
	Enforcement of breach	1-2 hours per individual	\$48/hour = \$96
Develop training materials		2-4 hours	\$48/hour = \$192/licensee
Training staff (4,096 card room employees)		4 hours	\$16.69/hour = \$66.76/employee
Training new staff (~ 42/month*) *based on new CRE's licensed between January 2021 and July 2021		4 hours	\$16.69/hour = \$66.76/employee

Total Cost of Compliance

Initial Costs:

Notifying individuals enrolled in existing programs:	~ \$1,469.74 (divided amongst 43 licensees)
Developing procedures (based on template):	~ \$384/licensee
Development of training:	~ \$192/licensee
Training staff:	~ 273,448.96 (divided amongst 43 licensees)
TOTAL INITIAL COST:	~ \$6,969.46/licensee

Ongoing Costs:

Cost to process Self-Exclusion Request Forms:	~ \$4.18/form
Supplies (paper, stamps, envelopes):	~ \$94.76 (per 100 forms)
Implementation of procedures:	~ \$836
Records retention:	~ \$10.93
	~ 1,359.69 (process 100 forms)

Designated contact person:	~ \$267.04/month
Training new staff:	~ \$66.76/month
TOTAL MONTHLY COST:	~ \$1,693.49/licensee*

*Calculated based on 100 individuals enrolling per month

SECTION 4:

Analyze whether the proposed rule may impose more than minor costs on businesses in the industry.

The minor cost threshold was found to be between \$10,126.91 and \$33,690.22. The cost for house-banked card room licensees to comply with the new chapter, chapter 230-23 WAC, is initially \$6,969.46 with a monthly implementation of \$1,693.49, based on 100 individuals enrolling every month, therefore compliance with the new chapter will not impose more than minor costs.

Initial costs are much higher than implementing the program thereafter. Initial costs will be dependent upon how many individuals on existing operator-level programs a licensee is required to notify and how many employees a licensee must train. Implementation thereafter will be dependent upon how many individuals enroll at a licensee's establishment. The implementation costs were calculated upon 100 individuals enrolling per month; however, it is unlikely that 100 individuals will enroll at every licensed house-banked card room every month. The total costs and the total implementation costs are likely to be much lower for most licensees.

SECTION 5:

Determine whether the proposed rule may have a disproportionate impact on small businesses as compared to the 10 percent of businesses that are the largest businesses required to comply with the proposed rule.

There are currently 43 house-banked card room licensees that will be required to comply with this new chapter, chapter 230-23 WAC. The Self-Exclusion Request Form will be made available on the Gambling Commission's website. Individuals interested in enrolling in the program have the option to return it directly to the Gambling Commission. However, they also have the opportunity to submit it to any house-banked card room licensee, therefore, costs may vary between licensees as some licensees may receive more forms than others and therefore accrue more costs than others.

Licensees are responsible for mailing the Self-Exclusion Request Form to individuals enrolled in operator-level programs. This will have a disproportionate impact as some licensees may have a larger number of individuals enrolled in an existing program than others, while some may not be operating a self-exclusion program at all and therefore not be required to notify anyone.

Over a third of the house-banked card room licensees (41%) are under the same ownership, which depending on how they choose to develop and implement procedures, could vastly reduce costs for the licensees under that ownership. This would disproportionately impact those licensees not included under this ownership as they would have to independently develop their own procedures for implementation of the program. For this reason, the Gambling Commission will be providing all licensees with a template for implementation of the self-exclusion program in an effort to reduce costs and maintain consistency across the state.

A majority of house-banked card room licensees (71%) utilize the Sonoma player-tracking system which may reduce implementation costs and help identify breaches, however it may be unlikely that an individual enrolled in the self-exclusion program would utilize their player-tracking card if choosing to participate in gambling activities while enrolled in the program. This could disproportionately impact those licensees who do not have a player-tracking system; however, a system is not necessary to implement the program.

Labor costs also vary between licensees so implementation of the program on the westside of the state may cost more than on the eastside of the state, for example.

SECTION 6:

If the proposed rule has a disproportionate impact on small businesses, identify the steps taken to reduce the costs of the rule on small businesses. If the costs can not be reduced provide a clear explanation of why.

The Self-Exclusion Request Form will be made available on the Gambling Commission's website and may be submitted directly to the Gambling Commission by any individual that is interested in enrolling the program. If an individual does submit a form to a licensee, the licensee has several options available to them for forwarding that information to the Gambling Commission, who is ultimately responsible for maintaining the database and distributing information to all licensees.

As stated in Section 5, over a third of house-banked card room licensees (41%) are under the same ownership, which depending on how they choose to develop and implement procedures, could vastly reduce costs for the licensees under that ownership. This could disproportionately impact those licensees not included under this ownership as they would have to independently develop their own procedures for implementation of the program. For this reason, the Gambling Commission will be providing all licensees with a template for implementation of the self-exclusion program in an effort to reduce costs and maintain consistency across the state.

SECTION 7:

Describe how small businesses were involved in the development of the proposed rule.

A representative from the house-banked card room industry was involved in the initial drafting of this chapter. Additionally, licensees with existing operator-level self-exclusion programs submitted those programs to the Gambling Commission to provide examples of what already exists in order to create an easy transition to the implementation of a centralized, statewide self-exclusion program.

Draft rules were sent out to all house-banked card room licensees for review and feedback on May 3, 2021. Feedback received was reviewed by staff and incorporated accordingly.

SECTION 8:

Identify the estimated number of jobs that will be created or lost as the result of compliance with the proposed rule.

It is unlikely that any jobs will be created as a result of the adoption of this new chapter, chapter 230-23 WAC. The role of a "designated contact person" to maintain the self-exclusion list for each house-banked card room licensee is likely to be incorporated into an existing position. No jobs will be lost as a result of the adoption of this new chapter.