

Pennsylvania Gaming Control Board
Enhanced Know Your Customer (KYC), Multifactor Authentication and Payments
Requirements
Interactive Gaming Account Creation Requirements

Identification and Liveness Check*

When creating an account, operators must require patrons to upload a valid government-issued photo ID and conduct a liveness check. The live photo of the patron must be compared to the uploaded ID to confirm the identity of the individual attempting to create an interactive gaming account.

Data Accuracy*

All data for account creation must be auto-filled from the uploaded ID, and patrons shall not be able to edit any information. If automatic KYC fails, patrons can use the manual KYC process. The following data must be authenticated through multisource verification before deposits, withdrawals or wagers can be initiated:

Exact Match:

- Date of birth
- Social Security Number (full or last four digits)
- Last name

Flexible Match:

- First name (e.g., Tom or Thomas will pass)
- Address (abbreviations allowed, P.O. Boxes not permitted)

Other Required Items:

- Phone number
- Email address (must be at least 72 hours old and verified)
- Patron acknowledgment that identity information is accurate

Manual KYC Process*

If a patron's exact match fields (date of birth, SSN, last name) cannot be verified through automated means, operators must conduct manual KYC. Requirements for manual KYC include:

1. Multisource authentication for re-entered or modified data.
2. If verification fails, patrons must provide additional documentation, including:
 - a. Government-issued photo ID
 - b. Social Security card
 - c. Proof of residence (e.g., utility bill)
3. Operators must log all manually verified accounts.
4. Incident Reports must be submitted to PGCB for changes to date of birth or SSN after account verification, including reasons and supporting documentation. The report must include the reason for the change and an attestation by the Interactive Gaming manager, or another

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employee identified as the responsible party by the operator, that supporting documentation was obtained from the patron verifying the modified identity information is accurate.

Additional KYC Requirements*

Deceased Individual Attempts:

Operators must file a fraud form with the PGCB and Pennsylvania State Police anytime an attempt is made to create an account for a deceased individual or when an operator determines an account has been created for a deceased individual.

Accounts in Multiple Jurisdictions:

If a patron uses an account created in another jurisdiction for interactive gaming in Pennsylvania, operators must enforce PGCB's enhanced KYC/MFA/Payments Requirements before any activity is allowed.

Device Account Limit:

Operators must limit each device to accessing no more than four interactive gaming accounts. Additional accounts can be allowed if operators contact patrons and obtain justification which is maintained and available for Board inspection.

Enhanced Multi Factor Authentication Requirements**

Operators must implement mandatory Multi-Factor Authentication (MFA) for all interactive gaming accounts using one of the following:

- Customer identity and access management product or software
- Fast Identity Online Authentication (FIDO) product
- Authentication apps (e.g., Google Authenticator)
- Biometric verification (face or fingerprint)
- Other PGCB-approved methods

Payment Method Requirements**

Patrons are limited to the following number of payment methods:

- 3 credit/debit cards
- 3 ACH banking accounts
- 1 account per third-party payment service (e.g., 1 PayPal, 1 Venmo)

Additional payment methods can be added after a 72-hour waiting period, provided the old method is deleted. New payment methods must pass address verification service (AVS) before deposits. If AVS fails, operators must verify the name on the payment method matches the name on the patron account.

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Geolocation Checks**

In addition to regular geolocation checks (at login, pre-wager and intervals), operators must perform soft geolocation checks during the following actions:

- Account creation: To detect if the device is in a high-fraud area.
- Deposits: New payment methods require a geolocation check to ensure the deposit originates from an acceptable location.
- Withdrawals: Operators must establish a maximum aggregate withdrawal limit of up to \$10,000. Once this threshold is reached geolocation checks must be performed to ensure withdrawals originate from an acceptable location.

Annual KYC Recertification**

Operators must require all patrons to re-upload a valid government-issued photo ID once a year. The ID must be verified to ensure it is current and accurate.

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