



PENNSYLVANIA GAMING CONTROL BOARD
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Sent via Electronic Mail

Interactive Gaming Certificate Holders and Operators
Interactive Gaming Manufacturers

**RE: Industry Guidance 2025-03
Guidelines for Bet Behind Feature in Interactive Blackjack Games**

Dear Operators and Manufacturers:

The Pennsylvania Gaming Control Board ("Board") has established guidelines for interactive gaming operators and manufacturers offering blackjack games that include the bet behind feature. The bet behind feature allows a player to place a wager on the outcome of a seated player's hand instead of playing their own hand. Bet behind participants share in the seated player's results without influencing the seated player's decisions. The purpose of this guidance is to ensure consistency and compliance with the Board's standards for implementing the bet behind feature in interactive blackjack games.

The bet behind feature is permitted in live-dealer and random-number-generator ("RNG") blackjack games, subject to the following requirements:

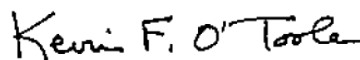
1. Bet behind may only be offered in blackjack games with limited seating.
2. Bet behind may be offered regardless of whether all seats at the table are occupied.
3. Seated player settings may be defaulted to allow bet behind wagers.
4. Seated players must have the ability to disable their seat from accepting bet behind wagers.
5. Seated players cannot place bet behind wagers on their own hands. However, they may place bet behind wagers on other seated players.
6. If a bet behind wager is placed on a seated player who chooses not to participate in the round, the bet behind wager must be refunded.
7. If the seated player surrenders their hand, the bet behind wager is resolved in the same manner.
8. Operators may establish distinct minimum and maximum wagers for seated players and bet behind players. These limits must be clearly displayed in the user interface.

9. Bet behind players may choose whether to place an insurance bet or to accept an even money payout for their blackjack when the dealer's up card is an ace.
10. Bet behind player settings must be defaulted to opt out of automatically doubling when the seated player doubles and follow only the first resolved hand if the seated player splits.
11. Bet behind players may adjust their settings to allow doubling when the seated player doubles and to play both hands when the seated player splits.
12. Bet behind players cannot make doubling or splitting decisions during the round. These preferences must be selected in advance through the settings menu.
13. If a bet behind player lacks sufficient funds to cover a double down or split, the bet behind wager will proceed as though the player chose not to double down or split, and the hand will be resolved accordingly.
14. Bet behind players may place side wagers in accordance with the Board's blackjack regulations, provided they place a base game wager as a prerequisite to placing side wagers, as applicable.
15. The game's help screens must fully describe the bet behind feature, including a clear explanation of all settings and default options for both seated and bet behind players, along with the option for seated players to disable bet behind functionality.

These requirements are effective immediately for games that have not been approved by the Board, including those currently pending review by the PGCB Gaming Lab or in the process of being tested by an independent testing lab. Games that have been approved by the PGCB, including those currently offered on interactive gaming platforms, must comply with these requirements, including testing and approval by the Board, by August 20, 2025.

If you have any questions or would like additional information, please contact Lee Copello, Director of iGaming Compliance, at (717) 210-8603 or via email at lcopello@pa.gov.

Sincerely,



Kevin F. O'Toole
Executive Director

KFO:lc

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