



PENNSYLVANIA GAMING CONTROL BOARD
303 WALNUT STREET, COMMONWEALTH TOWER
HARRISBURG, PENNSYLVANIA 17101

KEVIN F. O'TOOLE
Executive Director
303 Walnut Street
Commonwealth Tower
5th Floor, Strawberry Sq.
Harrisburg, PA 17101
Phone: (717) 346-8300
Fax: (717) 346-8350
Email: keotoole@pa.gov
Website: gamingcontrolboard.pa.gov

November 12, 2024

Chair
DENISE J. SMYLER

Commissioners
FRANK DERMODY
SHAWN DILLON
DAVID S. HICKERNELL
SARA MANZANO-DÍAZ
NEDIA RALSTON
FRANCES J. REGAN

Ex-Officio Members
PAT BROWNE
STACY GARRITY
RUSSELL C. REDDING

Sent via Electronic Mail

Slot Machine Manufacturers
Interactive Gaming Manufacturers
VGT Manufacturers
Independent Test Labs

**RE: Industry Guidance 2024-09
Administrative Clarification Regarding Maximum Odds Regulation**

Dear Manufacturers and Labs:

The Pennsylvania Gaming Control Board (“Board” or “PGCB”), Office of Gaming Laboratory Operations (“GLO”) has conducted a review of its methodology for evaluating Maximum Odds. Pursuant to § 461a.7(a)(6), “The odds of any winning combination may not exceed 50 million to 1”. Previously, on July 29, 2022, PGCB updated its Maximum Odds regulation interpretation to focus on all awards advertised to the slot machine patron. The intention was to avoid rejecting games where insignificant awards had non-compliant odds and to create more room for gameplay creativity, innovation, and volatility. While this previous change has allowed a significant number of games that would have previously been rejected to be approved, some unexpected consequences have occasionally led to gray areas regarding what is considered an advertised award and what information is required to be conveyed to the patron.

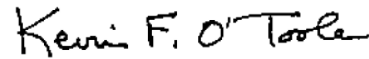
In an effort to further clarify the interpretation of Maximum Odds, and to reduce the number of gray areas, PGCB is adjusting the Maximum Odds evaluation approach to focus solely on the top award for all land-based slot machines, slot-like iGames, and VGTs. Effective January 1, 2025, GLO and licensed independent test labs will evaluate Maximum Odds in the following manner:

- The odds of achieving the highest advertised award that is based solely upon chance shall occur at least once in 50 million games.
- This does not apply to multiple awards won together on the same game where the aggregate prize is not advertised. However, it does consider the highest single multiplier (or advertised cumulative multiplier), as well as win-up-to statements.
- This odds rule shall not apply to games which make it possible for a player to win the highest advertised award multiple times through a bonus/feature.

- This rule shall apply to all wager categories that can win the highest advertised award.
- If the highest advertised award can occur within a bonus/feature, the odds calculation shall include the odds of obtaining the bonus/feature including the odds to achieve the award.
- This odds rule shall not apply to purely informational cumulative win limit language, provided it is not prominently displayed. Usually, this information is contained in an “About” section at the end of the help screens. Such cumulative win limits must still not decrease the theoretical payback percentage by more than 0.001%.

If you have any questions regarding this Administrative Clarification, you may direct them to Charles Leister, Gaming Lab Manager, via email at cleister@pa.gov, to ensure a clear understanding of the new Maximum Odds calculation standards. PGCB believes this change in interpretation and methodology will better align the PGCB’s standards with other United States jurisdictions and significantly reduce the amount of time devoted to troubleshooting Maximum Odds issues.

Sincerely,



Kevin F. O'Toole
Executive Director

KFO/cby

cc: Steve Cook, Chief Counsel, PGCB
Cyrus Pitre, Chief Enforcement Counsel, PGCB
Claire Yantis, Administrative Director, PGCB
Paul Mauro, Director, Bureau of Investigations & Enforcement, PGCB
Paul Resch, Director, Bureau of Gaming Operations, PGCB
Lee Copello, Director, iGaming Compliance Operations, PGCB
Kevin Kile, Director of Sports Wagering, PGCB
Elizabeth Lanza, Director, Office of Compulsive & Problem Gambling, PGCB
Heather Worner, Director of Gaming Laboratory Operations, PGCB
Chad Zimmermann, Deputy Chief Counsel, PGCB
Robert Wood, Senior Counsel, PGCB
Charles Leister, Gaming Lab Manager, PGCB