PENNSYLVANIA GAMING CONTROL BOARD
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Sent via Electronic Mail
Interactive Gaming Certificate Holders
Interactive Gaming Operators
Interactive Gaming Manufacturers
Sports Wagering Certificate Holders
Sports Wagering Operators

RE: Industry Guidance – 2025-01
Interactive Gaming Account Multi-Factor Authentication Requirement

Dear Interactive Gaming Stakeholder:

The Pennsylvania Gaming Control Board ("Board") is implementing enhanced requirements pertaining to the Know Your Customer ("KYC") process as it relates to the establishment of an interactive gaming account pursuant to 58 Pa. Code. § 812a.2. The enhanced KYC requirements are designed to align Pennsylvania with emerging best practices in other jurisdictions and industries to prevent fraud, bonus abuse, account sharing and unauthorized account access by self-excluded individuals and those under the legal age of 21. Operators must implement the enhanced KYC requirements on a going-forward basis and are not required to reverify existing accounts.

The enhanced KYC Multi-factor Authentication ("MFA") fraud prevention requirements apply to four areas of the players' interactive gaming account registration including account creation, MFA, payment methods, and geolocation checks. The purpose of the enhanced KYC requirement is to ensure critical patron identity information is verified as true and accurate. An exact match will be required for the birth date, Social Security Number and last name. Additionally, the birth date and last name must be scraped from the uploaded identification. The enhanced KYC requirement must be implemented by September 30, 2025.

The MFA, payment methods, and geolocation check requirements are meant to ensure the security of the interactive gaming account and provide insightful information to the operator that must be used for proactive identification of possible fraudulent activity. The MFA, payment methods, and geolocation checks portions of enhanced KYC, MFA, and fraud prevention requirements must be implemented by February 28, 2026.

Please refer to the attached KYC MFA enhancements industry guidance, which describe the requirements in detail. If you have any questions, please contact Lee Copello, Director of iGaming Compliance Operations, via phone at (717) 210-8603 or via email at lcopello@pa.gov.

Sincerely,

Kevin F. O'Toole

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Executive Director

KFO:lc

Enclosure

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
Heather Worner, Director of Gaming Laboratory Operations, PGCB

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*

The data for date of birth and patron's last name for account creation must be auto-filled from the uploaded ID, and patrons shall not be able to edit the date of birth or last name 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 (Email address must be verified by a 3rd party vendor or via an email verification link sent to the patron. Information obtained from the email verification must be used to ascertain the email address is owned by the registering patron, i.e. is the email address related to the location of the patron's address, IP, phone number, etc.)
- 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

*Must be implemented by 9/30/2025
**Must be implemented by 2/28/2026

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 within a 14 day period. 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**

MFA checks are required at least every 14 days for each different device used to access the interactive gaming account. 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 (OTP via SMS will be acceptable until January 1, 2027, after that date a new method must be implemented. OTP that are send using email are no longer an acceptable method to conform with the MFA requirement.)

Payment Method Requirements for new accounts less than 6 months old or accounts that have been inactivate for 6 months**

Patrons who created an account less than six months ago or patron's whose accounts have had no activity for six months 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)

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

Payment Method Requirements for accounts in good standing and greater than 6 months old or accounts with gaming activity in the last 6 months**

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 or if the patron contacts the operator's customer support and request the addition of a new method, provided an existing payment method is deleted. If the patron contacts customer support, customer support or the patron must remove an existing method of payment on the account prior to depositing to from the new method. If the patron contacts customer support, the new payment method can be made available immediately for deposits and withdraws. New payment methods must pass address verification service (AVS) (pass result requires address and ZIP code to be matched) before deposits. If AVS fails, operators must verify the name on the payment method matches the name on the patron account.

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 at the time of expiration of the ID on file plus 90 days. (i.e. if a patron's ID on file expires 1/1/26, the operator must obtain a new ID upload and verify the ID by 3/31/26) The ID must be verified to ensure it is current and accurate.