



PENNSYLVANIA GAMING CONTROL BOARD
HARRISBURG, PENNSYLVANIA

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February 9, 2026

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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 – 2026-01
Extended Deadline for Interactive Gaming Account Continuous KYC Requirement**

Dear Interactive Gaming Stakeholder:

On January 22, 2025, the Board issued Industry Guidance – 2025-01 outlining enhanced Know Your Customer (“KYC”) requirements for interactive gaming accounts under 58 Pa. Code § 812a.2. These measures are designed to align Pennsylvania with best practices to combat identity theft, fraud, money laundering, account sharing and unauthorized account access by self-excluded individuals or those under the legal age of 21.

One provision originally scheduled for implementation on February 28, 2026, was the Annual KYC Recertification. This provision requires operators to obtain and verify a valid, government-issued photo identification from each registered player within 90 days of the expiration of the ID currently on file. After further review, the Board is extending the deadline for this requirement to February 28, 2027.

Additionally, operators may propose a risk-based alternative approach for ID verification of existing registered players, subject to approval by the Board’s Executive Director. This flexibility acknowledges the operational challenges of collecting valid, government-issued photo IDs for large databases of existing registered players and aims to avoid unnecessary account suspensions that could disrupt player access to deposits, withdrawals and wagering.

The purpose of continuous KYC remains unchanged: Ensuring that patron identity information is accurate and that the individual using the account is the registered player. Operators must demonstrate ongoing efforts to prevent identity theft, fraud, money laundering and unauthorized account access through effective monitoring, detection and reporting protocols. Key questions to address include:

- Is the registered player a real person?
- Is the individual using the account the registered player?
- Does the player’s gaming activity appear consistent and free from indicators of fraud or suspicious behavior?
- Can the operator keep answering those questions continuously?

All other provisions of Industry Guidance – 2025-01 scheduled for implementation on February 28, 2026, remain in effect and must be adhered to. This includes, but is not limited to, multi-factor authentication protocols, payment method limits and geolocation requirements, which are aimed at safeguarding player accounts and detecting fraudulent activity.

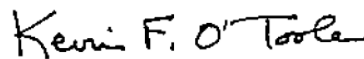
Operators seeking to implement an alternative to the valid, government-issued photo ID provision for existing registered players must submit a detailed proposal by July 31, 2026, to Lee Copello, Director of iGaming Compliance Operations, via email at lcopello@pa.gov or via phone at (717) 210-8603.

Proposals must include:

- A description of the proposed method or technology
- Evidence of regulatory compliance
- Risk mitigation strategies and anticipated benefits

Thank you for your continued cooperation in maintaining the integrity and security of interactive gaming in Pennsylvania.

Sincerely,



Kevin F. O'Toole
Executive Director

KFO:lc

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
Sean Hannon, Director, Bureau of Licensing, 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