

April 6, 2023

Bingo Stakeholder Engagement

What We Heard

POLICY AND PUBLIC AFFAIRS

AGLC WHAT WE HEARD

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Acknowledgement

Thank you for your participation

Alberta Gaming, Liquor & Cannabis (AGLC) would like to thank all stakeholders who participated in the bingo survey. We were fortunate to receive feedback from a diverse group of bingo stakeholders across Alberta, including bingo association presidents and hall managers.

Through this process, AGLC has deepened its understanding of the benefits and challenges experienced by those in the bingo industry.

Thank you for your time,

Kandice Machado
Chief Executive Officer (CEO), AGLC



Background

Commercial Bingo Handbook Red Tape Reduction Review

AGLC recognizes the valuable role bingo plays in helping support charitable programs and services in Alberta. In 2020-21, bingo generated \$9.4 million in total proceeds, which support thousands of programs and services provided by charitable organizations to their communities.

Purpose

AGLC has conducted a comprehensive red tape reduction (RTR) review of the Commercial Bingo Handbook (CBH) to modernize bingo policy, support charitable organizations and reduce regulatory red tape by:

- identifying and eliminating unnecessary regulatory burdens;
- maintaining the integrity and fiscal accountability of bingo facility licensees and licensed charities;
- modernizing bingo policy to ensure it accurately reflects current AGLC requirements; and
- meeting the needs of bingo stakeholders.



Methodology

Stakeholder Engagement Survey

On November 15, 2022, AGLC invited all bingo association presidents and hall managers of the 20 bingo halls across Alberta to participate in an online survey regarding proposed policy changes to the Commercial Bingo Handbook (CBH). Participants received a Survey Guide which provided an overview of the proposed changes and additional information to assist stakeholders in answering the survey questions. Participants were also sent detailed policy amendment summaries, which identified all proposed policy changes and the corresponding rationale.

The survey primarily consisted of written response questions in which respondents were asked to provide comments regarding the proposed policy changes for each section of the CBH.

The survey and survey materials were also shared with Bingo Alberta. The survey remained open for one month and closed on December 15, 2022.

Response Rates

At least one person from 16 of the 20 bingo halls completed the survey, resulting in an overall response rate of 80 per cent.

Seventy per cent of hall managers completed the survey, along with 40 per cent of bingo association presidents.

Data Limitations

Based on the response rates, the results of this survey may reflect the perspectives of hall managers to a greater degree than bingo association presidents.

While AGLC did not reach out to bingo association member charities, it is assumed the feedback received from bingo association presidents represented the views and needs of their member charities.

Further, AGLC is unable to determine whether stakeholders who did not respond to the survey are in support of the proposed changes.

80 per cent

OVERALL RESPONSE RATE

16 of 20 bingo halls had at least one person complete the survey.

70 per cent

HALL MANAGER RESPONSE RATE

14 of 20 hall managers completed the survey.

40 per cent

ASSOCIATION PRESIDENT RESPONSE RATE

8 of 20 bingo association presidents completed the survey.

Scope

In the Survey Guide, stakeholders were informed the following information was considered in-scope and out-of-scope for the current Commercial Bingo Handbook (CBH) red tape reduction (RTR) Review:

In Scope:

- Feedback from stakeholders on the proposed policy amendments.
 - Other suggested amendments brought forward by stakeholders will be considered during a future review of the CBH.

Out of Scope:

- Amendments to Alberta’s charitable gaming model:
 - Eligibility for a bingo or pull ticket licence
 - Use of gaming proceeds
- Amendments to the Criminal Code (Canada), the *Gaming, Liquor and Cannabis Act* (GLCA) or the Gaming, Liquor and Cannabis Regulation (GLCR).
- Section 4.6 (previously Section 4.8) was considered out-of-scope because it was recently amended in November 2021, in consultation with bingo stakeholders.
- Sections 9.6 to 9.9 and Section 10 were considered out-of-scope, as AGLC is currently reviewing its policies regarding new gaming facilities as well as the expansion, relocation and renovation of gaming facilities. These sections will be updated at a later date to reflect the outcome of the review.

The What We Heard report includes feedback related to the proposed policy amendments.

Next Steps

HOW AGLC WILL ADDRESS ADDITIONAL FEEDBACK

Stakeholders provided a significant amount of feedback in the survey which was not related to the proposed policy amendments in the current CBH RTR Review. This feedback is not included in this What We Heard report.

AGLC is committed to exploring additional feedback during a future review of the CBH. This will ensure AGLC is able to properly consider the proposed changes, consult the bingo industry prior to the implementation of changes and confirm policy changes reflect the needs of all bingo stakeholders.

Survey Results

Supported by Stakeholders

Survey respondents provided the following feedback in support of the proposed policy changes:

- Respondents supported the removal of guidelines in the policies and the principles for gaming, as well as the large number of operational policies which were proposed to be removed from the Commercial Bingo Handbook (CBH).
- Respondents expressed support for the creation of a stand-alone document, which outlines Commercial Bingo Rules of Play and House Rules.
- A number of respondents supported removing the maximum number of bingo games allowed in a bingo program for an event. This change will provide flexibility for bingo facility licensees to respond to their unique marketplace and customers.
- Regarding pull ticket policy, one respondent supported the change to allow a pull ticket seller to sell more than one type of pull ticket.
- One respondent highlighted the financial aspect of conducting and managing bingo events is not easy to deal with. However, the proposed changes to Section 8 will help to make things a little easier to understand and may not require as much paperwork.



Survey Results

Feedback and Clarification

Survey respondents brought attention to the following items which were related to the proposed policy changes. AGLC is able to provide additional clarification on these items.

- Respondents identified “bingo worker” and “key employees” should be defined.
 - **Clarification:** A definition has been added for “bingo event worker”, a new subclass of registration, which includes all hall advisors, assistant hall advisors, callers, cashiers, seller/checkers, bingo coordinators and pull ticket sellers. Those registered under this category may perform any of the positions listed, provided only one position is performed at a time.
 - **Clarification:** The term “key employees” was an outdated term, which has now been removed from the Commercial Bingo Handbook (CBH) and replaced with “hall manager.”
- Respondents expressed concern with the removal of the event management system (EMS) administrator position, and the transfer of EMS administrator duties to the hall manager.
 - **Clarification:** The hall manager may be assisted in carrying out the EMS administration duties by up to two other existing paid staff (i.e., assistant hall manager, advisor, caller or cashier).
- Respondents requested further clarification regarding whether only one progressive game or scheme can be offered at one time.
 - **Clarification:** Bingo halls are not restricted to offering only one progressive game or scheme at one time. The updated policy only removes the limitation on the maximum number of progressives which may be offered at a time.



- Regarding changes to event fees, respondents highlighted AGLC approval is currently not required to decrease event fees.
 - **Clarification:** Outdated policy has been amended to reflect the current requirements. Prior AGLC approval is not required to decrease event fees.
- One respondent noted changes to policies regarding the registration of gaming workers will make it easier for staff since they will have to register only every five years.
 - **Clarification:** The registration term for registered bingo workers was increased from a two-year period to a five-year period on November 1, 2022. This amendment is not considered part of the current CBH red tape reduction (RTR) Review.
- Respondents expressed concern regarding the new requirement for a logbook to record individuals who access restricted areas. Respondents noted the logbook requirement should be limited to the secure server room.
 - **Clarification:** Halls are required to keep a logbook only to record instances when individuals who are not registered gaming workers (such as maintenance or repair persons) access restricted areas. The logbook allows the local management of restricted area access requirements instead of requiring prior AGLC approval.
- In the event of a power or equipment failure, respondents noted proceeding with the bingo game is not possible since the EMS is vital to the operation of the bingo event.
 - **Clarification:** The policy respondents referenced with this comment is related to instances when video/audio equipment or recordings are not working as separate from a power failure. The Commercial Bingo Rules of Play and House Rules contains procedures which must be followed when video/audio equipment and recordings are not working.



- A respondent expressed the need for consistency amongst all gaming facilities regarding paying out prizes in cash.
 - **Clarification:** Currently, all bingo halls must comply with the existing policy related to payment of prizes. AGLC is satisfied with the consistency of how bingo halls pay out event and progressive prizes.
- Respondents noted AGLC should adopt a process to advise bingo facility operators of instances when the bingo licence of a member charity is under review.
 - **Clarification:** Currently, if a member charity does not provide its outstanding Financial Review reports to AGLC within a specified period, the bingo hall will be advised the charity is not able to hold events. If the charity has an event scheduled within 30 days, it can proceed with its scheduled event; however, if the charity does not have an event scheduled within 30 days, its licence may be suspended. In these situations, the bingo hall is notified by AGLC. AGLC will not provide information to the bingo hall regarding the status of a member charity's licence prior to this point, because often any issues are resolved before the member charity's next event.
- Respondents observed specific sections of the Gaming, Liquor and Cannabis Regulation (GLCR) are cited throughout the CBH. Respondents expressed concern whether changes to the GLCR would require subsequent amendments to the CBH, and suggested AGLC consider referencing the GLCR instead of specific sections.
 - **Clarification:** Specific sections of the GLCR are cited in the CBH and other gaming handbooks to maintain consistency and to provide registered gaming workers with information regarding the registration requirements.
- Respondents requested clarification regarding whether certain positions must be staffed by volunteers. Respondents were unsure whether the bingo hall is permitted to conduct the bingo event if the charity fails to arrive.
 - **Clarification:** In exceptional circumstances, where a licensed charity does not show up for its scheduled event or if the bingo facility licensee receives short notice a charity's bingo licence has been suspended/cancelled, individuals may be paid to work at the event instead, using gaming funds or non-gaming funds and subject to the conditions specified in Subsection 4.4.1.
- Respondents noted the amounts of event cash shortages, which must be reported, should be increased due to inflation.
 - **Clarification:** Cash shortage amounts are based on the price of bingo cards, not on inflation.
- A respondent noted an apparent conflict in policy regarding whether paid staff may work any position versus only some positions.
 - **Clarification:** There is no conflict in policy. Subsection 4.3.14 includes policy for registered staff employed by a bingo facility licensee who are also members of a licensed charity within the bingo facility. Subsection 4.4.1 includes policy for paid staff of the licensed charity.

- Respondents expressed concern “AGLC approval” is implied by the requirement for non-progressive games and schemes to be submitted for “AGLC review.”
 - **Clarification:** Due to eBingo transition, AGLC is currently providing additional support for bingo halls when establishing their bingo games and schemes to ensure proper game set-up and reporting. As bingo halls become more independent, AGLC intends for this process to more closely resemble a review process.
- Respondents requested clarification regarding policy related to “free cards” provided as part of a hall promotion such as Player of the Week.
 - **Clarification:** Subsection 5.1.15 states the bingo facility licensee’s rules of play for Loonie Pots must not prevent Loonie Pots from being won on free cards. Loonie Pots must be able to be won on free cards.
- Respondents requested clarification on the AGLC profitability requirement.
 - **Clarification:** Section 8.11 clarifies all bingo facility licensees must make positive pool contributions to the charity pool from the bingo and pull ticket streams (if applicable), calculated separately for each pool period. The monthly pool contribution equals gross sales (plus cash overages/less cash shortages), less prizes, less total approved expenses. AGLC will review compliance with the profitability requirements for bingo and pull tickets semi-annually throughout the licence period.
- Respondents questioned whether Subsections 5.3.2 and 5.3.3 were redundant.
 - **Clarification:** Subsections 5.3.2 and 5.3.3 are distinct policies, which are not redundant:
 - Subsection 5.3.2: All cash prizes must be awarded in Canadian funds.
 - Subsection 5.3.3: All prizes in the bingo program must be awarded.
- Respondents requested clarification regarding whether pull ticket funds must be turned over to the bingo chairperson or the pull ticket manager, and whether this must occur after each pull ticket unit is sold or after each event.
 - **Clarification:** Subsection 6.4.7 states cash from pull ticket sales must be balanced each time revenue (specified unit gross amount) from the sale of one pull ticket unit is turned over to the bingo chairperson. This means pull ticket funds must be turned over to the bingo chairperson after each pull ticket unit is sold.
- Respondents expressed concern regarding the types of pull tickets represented in Section 6: Pull Tickets. Respondents noted there should be distinct policy requirements for traditional pull tickets, bingo event tickets (balls), and seal tickets since each of these games is handled differently in terms of bundling, ticket sales, deposits, winner determination and prize payment.
 - **Clarification:** Current pull ticket policy is organized in terms of the two options for how pull tickets can be played: seal card units and bingo event tickets.

- A respondent suggested charities should be able to transfer surplus event fees to their reserve account.
 - **Clarification:** Surplus event fees are intended to be directed to support charities in their delivery of charitable programs in the community. The event fee is only intended to cover the approved event expenses, which are necessary in order to conduct the bingo event.
- A respondent noted expenditures of less than \$20,000 currently do not require AGLC approval, regardless of whether these expenditures are for the facility reserve fund or not.
 - **Clarification:** The respondent is correct. Expenditures of less than \$20,000 do not require AGLC approval. Prior AGLC approval is required for facility reserve fund proposed expenditures exceeding \$20,000.
- A respondent requested clarification on the removal of prescriptive policy regarding event recordings and the verification unit. The respondent questioned why AGLC would not want recordings and verification units in place.
 - **Clarification:** No requirements were removed regarding event recordings and the verification unit; rather, policy was consolidated to remove repetition.
- A respondent expressed concern regarding bingo balls, noting only one registered gaming supplier has bingo balls available, and prices are increasing. Bingo halls are looking to suppliers from the United States, where they may not be able to purchase.
 - **Clarification:** Bingo halls are required to purchase all bingo equipment, including bingo balls, from gaming suppliers registered with AGLC to maintain the integrity of the bingo event.

