



**Statement of Keith Whyte, President, Safer Gambling Strategies LLC**  
**Pros and Cons of iGaming & Problem Gambling Services Update**  
**Joint Subcommittee to Study the Feasibility of Establishing the Virginia**  
**Gaming Commission**  
**Tuesday, August 19, 2025**

**Dear Representative Krizek and Senator Reeves:**

Thank you for the invitation to testify before the Joint Subcommittee on the pros and cons of iGaming as well as the status of problem gambling services in Virginia.

I founded my firm, Safer Gambling Strategies, in January 2025 to promote responsible gambling and prevent gambling addiction. My current clients are Birches Health, Illinois Council on Problem Gambling, Massachusetts Gaming Commission, RecoverMe, Rhode Island Council on Problem Gambling, Sports Betting Alliance. I serve on the Board of the Virginia Council on Problem Gambling and the Virginia Partnership on Gaming and Health as well as the Advisory Board of the National Voluntary Self Exclusion Program. Previously I served as Executive Director of the National Council on Problem Gambling from 1998 to 2025. I was Director of Research for the American Gaming Association and worked at the American Bar Association and US Department of Health and Human Services. I'm a graduate of Hampden-Sydney College and live in Arlington.

My remarks and recommendations today are not on behalf of any client or organization but are based on my three decades of experience in the gambling field to help this committee and my state address these issues.

Overall I strongly support the creation of the Virginia Gaming Commission (VGC). In relation to the VGC I'll address the pros and cons of iGaming as well as the status of problem gambling services in Virginia.

## **I. Pros & Cons of iGaming**

### **1. Moving Players Out of the Illegal Market**

Illegal gambling operators provide no consumer protections and do not contribute to Virginia's Problem Gambling Treatment and Support Fund (PGTSF). They often target minors and self-excluded individuals. The illegal market is big business—the American Gaming Association recently reported \$18.6 billion in illegal iGaming revenue nationwide, with only one in four U.S. players gambling exclusively on legal sites. The Campaign for Fairer Gambling reports much higher revenue figures, but similarly estimates illegal operators control roughly 75% of the U.S. iGaming market. Channeling existing players from the black market to the legal, regulated space is to everyone's advantage.

### **2. Using Technology to Promote Safer Gambling**

Regulated online platforms have advanced tools to detect and address risky gambling behaviors before harm occurs. For example, New Jersey's Division of Gaming Enforcement requires operators to monitor for indicators such as rapid betting, chasing losses, or extended sessions, and to provide timely interventions take proactive steps when risky patterns emerge. Players could be encouraged, and even incentivized, to take control through deposit limits, time limits, budget calculators, and personalized activity dashboards. Meanwhile, innovations in digital health, such as teletherapy, recovery apps, and gambling-specific blocking software, are making world-class treatment services more accessible than ever. Self-exclusion systems now allow secure, encrypted enrollment online across all licensed operators in a state, and ideally across the country. Virginia should join such a system as well as facilitate access to these apps.

### **3. Higher Risk of Gambling Problems in iGaming**

Research consistently shows iGaming is associated with elevated risk for gambling addiction. Some of the highest rates of problems are found among 18-35 year old male online gamblers in Virginia and nationwide. The recently published data from the 2024 National Survey of Gambling Attitudes and Gambling Experiences (NGAGE), the largest ongoing US survey of gambling experiences and attitudes in the nation, confirms these trends. While NGAGE also suggests risky gambling behavior has leveled off since its pandemic-era increase, it is too early to assume rates are stable. Advertising growth, mobile betting expansion and illegal operators remain risk factors—balanced somewhat by increased services funding, improved public awareness, and better treatment access.

#### **Recommendations for the Virginia Gaming Commission re iGaming:**

- **Adopt the National Council on Problem Gambling's Internet Responsible Gambling Standards (IRGS)** as a baseline requirement for all online gambling,

including online sports betting. These standards ensure informed decision-making, responsible marketing, and proactive support for at-risk players. Independent audits should verify operator compliance.

- **Include all forms of online gambling in VGC mandate**, including daily fantasy sports, social casinos and sweepstakes. The VGC should share compliance and exclusion data across jurisdictions, coordinate public education about legal versus illegal operators and aggressively crackdown on the illegal market.
- **Appoint a VGC Director of Responsible Gambling**—modeled after the Massachusetts Gaming Commission—responsible for developing and enforcing a statewide responsible gambling framework and coordinating with all stakeholders.

## **II. Problem Gambling Services Update**

I commend the General Assembly for including in House Joint Resolution 10 a mandate for the Virginia Gaming Commission to “effectively prioritize problem gambling prevention and treatment efforts.” This is critical as prior to the legalization of casinos the problem gambling services infrastructure in Virginia was rudimentary and while it has grown since it is still nascent and the growing pains are evident.

Gambling addiction has long existed in Virginia, but with the expansion of gambling, introduction of state-funded problem gambling prevention and awareness programs and increased promotion of the Helpline number by all stakeholders, calls have skyrocketed. Between 2019-2024 total calls increased 1,500% and intakes (actual calls for help) increased 223%. While most who gamble will not suffer harm, every Virginian deserves access to effective problem gambling prevention, treatment, and recovery support.

Since 2019, Virginia has built publicly funded problem gambling services from scratch, but unfortunately the state has largely excluded the expertise of the Virginia Council on Problem Gambling (VCPG), representing prevention, treatment, research, and recovery stakeholders. Nevertheless, VCPG continues to maintain the Helpline and has developed a best-in-class, highly effective peer program connecting help seekers with treatment and recovery services.

In most states, nonprofit state councils receive substantial funding to implement statewide, evidence-based programs much more efficiently and cost-effectively than the state government. As an example, centralizing public awareness campaigns through VCPG would create a consistent statewide brand and more efficient use of funds. And if properly resourced, VCPG could ease the workload on Community Services Boards, which are stretched thin. Continuing to exclude VCPG contradicts national best practices, creates

service gaps, and undermines the state's own commitment to effective problem gambling prevention and treatment.

**Recommendations for Virginia Gaming Commission re problem gambling services**

- **Allocate VGC funds to research on problem gambling and responsible gambling,** since the PGTSF does not specifically include research. Should include support of the Virginia Center on Gaming and Health, to conduct strategic and non-partisan research benefiting individuals and families adversely impacted by their gambling through evidence-based prevention, education, and intervention programs.
- **Hold other state agencies accountable,** as the sole state agency focused exclusively on gambling issues in Virginia. The VGC could play a valuable role in ensuring coordination, cooperation and fulfillment of obligations by other agencies who may have a role in gambling but it is not their primary responsibility or interest.
- **Include VGC representatives on the Problem Gambling Advisory Task Force.** Formalize the group and create a statewide strategic plan to address problem gambling, balanced between prevention, education, treatment, research and recovery with shared responsibilities and shared funding between the public and private sector.

Thank you for the opportunity to testify today and I look forward to answering any questions.