



To: Jordan Maynard, Chair
Eileen O'Brien, Commissioner
Brad Hill, Commissioner
Nakisha Skinner, Commissioner
Paul Brodeur, Commissioner

From: Carrie Torrisi, Chief of Sports Wagering Division

Date: September 30, 2025

Re: Player Limiting Data Analysis Results and Possible Next Steps

BACKGROUND

The Commission began reviewing the issue of player wager limitations in the spring of 2024, seeking to better understand how, when, and why a player might be limited to lower wager amounts by licensed Massachusetts operators. Following two roundtables with Massachusetts operators and industry experts, the Commission's Sports Wagering Division (SWD) sent a data request on December 10, 2024, to licensed Massachusetts operators seeking data related to the stake factor¹ and closing line value (CLV)² of registered players on each operator's platform (*see* Attachment A).

The goal of this request was to determine if the data supported a conclusion that a correlation exists between a player's stake factor and CLV, *i.e.*, between the extent to which a player is limited and their tendency to place "good" bets by beating the closing line.

On April 10, 2025, the SWD sent a follow-up information request to operators seeking answers to specific questions related to player limiting to better understand operators' current practices and procedures (*see* Attachment B).³

On June 5, 2025, the SWD sent a second data request to operators seeking updated data for the player accounts identified in the first data submissions (*see* Attachment C). The goal of this second request was to determine if changes in CLV over time resulted in changes to stake factor.

¹ "Stake factor" is a number assigned by an operator to a player that determines the amount that the player can wager above or below the default wager limit that would exist on the day an account is created.

² "Closing line value" is a measure of how "good" or "sharp" a player is based on whether they place their wager at better odds than the odds at which the wager closes.

³ This information request also included questions related to VIP programs, which will be addressed at a future Commission meeting.



The Commission engaged a data analyst to assist in drawing conclusions from the data received.

DATA ANALYSIS RESULTS

Reviewing the data across all operators, the analysis confirmed that players who consistently beat the closing line are more likely to have a lower stake factor (*i.e.*, have their limit lowered) and players who do not consistently beat the closing line are more likely to have a higher stake factor (*i.e.*, have their limit raised). In addition, individuals whose limits have been raised are far more likely to be classified as VIPs while very few limited players had VIP status.⁴

While percentages vary across operators, on average, the total percentage of Massachusetts player accounts that were limited as of December 10, 2024, was 0.64%.⁵

Among those limited players, 12.7% of that 0.64% were limited severely to less than 1% of the default, 57.6% were limited to 1-24% of the default, 11.9% were limited to 25-49% of the default, 14.3% were limited to 50-74% of the default, and 3.4% were limited to 75-99% of the default.

The second data request sought to identify whether any change in a player's performance over a six-month span was linked to a change in stake factor. The result of the data analysis was that most players had no change in their stake factor over this six-month period even if their CLV had changed substantially.

CONCLUSION

The Commission sought to answer the question of whether a correlation exists between a player's stake factor and CLV, *i.e.*, whether there is a trend showing that players who demonstrate a tendency to win have their limit decreased and players who demonstrate a tendency to lose have their limit increased. The data received from operators confirms that the answer to that question is yes.⁶

POSSIBLE NEXT STEPS

There are many things that the Commission may consider in terms of next steps, and we now seek your guidance on how you would like to proceed. Below are several possible options,

⁴ The SWD will be bringing a more detailed conversation about VIP programs at a future meeting.

⁵ This percentage represents player accounts and not necessarily individual players, as players might have limited accounts with multiple operators.

⁶ While there are likely other factors that go into determining a player's stake factor, this analysis focused only on the correlation between stake factor and CLV.



though this list is not all-inclusive. We would, of course, seek public comment, including input from operators, on any regulatory changes before implementation.

1. Regulations

- a. **Notifications:** Draft regulations requiring that players be notified of the fact that they have been limited (this notification could include the fact that they have been limited, why they have been limited, and/or to what extent they have been limited);
- b. **Truth-in-Advertising Transparency:** Draft regulations requiring that operators provide a statement on their platform that informs players that they may be limited if they demonstrate certain behavior (this would include behavior identified by the operators in response to the SWD's April 10, 2025, request);
- c. **Internal Controls/House Rules:** Draft regulations requiring that operators' internal controls and house rules include a process detailing how and why players may be limited;
- d. **Written Protocols and Procedures:** Draft regulations requiring operators to implement and provide to the Commission written protocols and procedures governing how stake factor determinations are made, including how stake factors are adjusted over time;
- e. **Mandatory Reporting:** Require regular reporting related to limited players, which could include the number/percentage of limited players, limited player stake factor and CLV, or any other information that the SWD or Commission might identify;
- f. **Manual Review of Stake Factors:** Draft regulations requiring operators to manually review the stake factor of all limited players every six months.

2. Additional Data Analysis

- a. **Ongoing Data Monitoring/Biannual Audit:**
 - i. Conduct a biannual audit of player stake factor and CLV using the same player accounts from the initial data request;
 - ii. Conduct a biannual or annual audit of all operators to identify percentage of limited players;



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- iii. Conduct ongoing data monitoring following any regulation implementation.
 - b. **Additional Data Request:** Request data from operators for the same two dates and the same players showing other data points such as number of bets placed and/or amount of handle to confirm whether correlation also exists between betting activity and stake factor and/or handle and stake factor.
3. Continued Research
- a. **Proportionate Limits:** Research feasibility and implications of mandating proportionate limits above and below the default (*e.g.*, if the default stake factor is 100 and the lowest stake factor any player has is 1, then the highest stake factor any player could have would be 199);
 - b. **Maximum Percentage of Limited Players:** Research feasibility and implications of setting limit on percentage of players that can be limited by an individual operator.