



**OPERATING STANDARDS  
ANNUAL BUSINESS PLAN  
EFFECTIVE DATE: APRIL 1, 2024**

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**OVERVIEW**

A Video Lottery Sales Agent (VLSA) is required to submit to the Ohio Lottery Commission (OLC) an annual business and marketing plan.

**REFERENCE DOCUMENTS**

Ohio Administrative Code [3770:2-3-05](#)

Ohio Revised Code [3770.21](#)

Video Lottery Sales Agent Terms and Conditions

**STANDARDS**

**Annual Business Plan** - Each VLSA is required to submit an annual business plan. The plan shall include a projection of expected VLT gaming and other revenues, earning objectives, and planned capital investments including how those costs will be expended and funded.

The Business Plan should include video lottery operations, sports gaming operations, and planned support for horse racing operations including capital investments.

**Responsible Gambling Programming** - Each VLSA shall maintain a responsible gambling program. Such program is subject to review. The program must include messaging in-venue, in marketing materials, and in the digital environment.

The annual program should include staff awareness and training plans and other initiatives of note.

**Advertising and Marketing** The annual plan shall identify any branding and positioning advertising campaigns as well as annual media planning. Also provide advertising & marketing plans and forecasted budget spend to promote racing and sports gaming operations.

**Promotional Budget Plan** - Each VLSA shall outline an annual planned promotional credit (Free Play) budget, by month, and should identify the allocation in various categories including those described below. The OLC understands that this may require recalculation during the year and requests that adjustments be submitted as soon as practical.

This annual submission does not eliminate the requirement that individual promotional offerings must be provided to and approved by the OLC in the monthly submission process outlined in the Marketing and Advertising operating standards.



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1. **Direct Mail/Email, Player Re-Investment, and/or Loyalty Offers** – This should include monthly mail offers and added incentives such as “bounce back” or “bonusing” promotions offered to the guest on a recurring basis.
2. **Mass Market Promotions** – Promotional credit (Free Play) promotions and big-ticket promotions, such as a car or vacation giveaways. These promotions need to include details relating to guest eligibility criteria, or any other specific qualifiers.
3. **Weekly & Monthly Promotions** - These promotions typically reoccur, such as Lucky Seniors, or New Member Promotions. These promotions need to include the details of the offerings and how they will be awarded when submitting these monthly to the OLC. If the promotion is monthly and is expected not to change, these may be submitted quarterly or annually.
4. **Seasonal Promotions:** These promotions typically reoccur, such as bus promotions, or local area sponsorship promotions. These promotions need to include the details of the offerings and how they will be awarded when submitting these yearly/seasonally to the OLC.
5. **Guest Appeasement, Service Recovery, and Discretionary Free Play** – Any promotional credits issued to a guest as a comp, guest appeasement, discretionary incentive, or competitive tier match are to be authorized and documented in accordance with the OLC MICS and/or operating standards and is required to be included in the VLSA’s monthly promotional credit forecast/spend report.
6. **Earned Free Play** – Promotional credits earned by the guest as a result of redeeming their earned points/comps are required to be included in the monthly promotional credit forecast/spend report.
7. **Enterprise Promotion Point Conversion** – The Ohio Lottery may allow the VLSA to convert points garnered from enterprise (corporate) promotions involving gaming or activities conducted independent of the VLSA. These promotions must be submitted to the OLC for review. The OLC will not provide approval of enterprise promotions conducted independent of authorized VLSA gaming activity but may approve the conversion of points garnered from such promotions to promotional credits. Promotional credits cannot be directly offered in an enterprise promotion that does not directly involve authorized VLSA gaming activity.



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8. **Credit Cards** - The Ohio Lottery allows points garnered from credit card transactions to be converted to promotional credits by Ohio VLSAs. Promotional gaming credit offers and/or programs must be submitted to the OLC and approved prior to any promotional gaming credit offers and/or programs being implemented.

Annual submissions shall provide information regarding rules, points earnings, and points redemption, including an overview of the marketing purpose and benefits to the OLC. In addition, a VLSA must submit to the OLC for consideration:

- a) A full description of the rewards program, including published earning and redemption scales. A copy of the credit card agreement must be provided.
  - b) A description of the ability of the VLSA or card issuer to itemize the estimated and actual points converted from credit card transactions into promotional gaming credits.
  - c) A reporting mechanism that allows for the segregation of other promotional gaming credits versus the credit card transaction promotional gaming credits earned must be available. This data must be included in the monthly promotional redemption reporting.
9. **Other Categories** – Submit tournaments, merchandise, mobile app utilization & loyalty rewards, cashless platform usage incentives, travel/tourism, private events (including banquets and fund-raising activities), and bus/group programs monthly to the OLC. Promotional credits cannot be substituted within the promotional rules when a product is no longer available; however, a substitute product or cash may be offered.