

Proposed Filing - Coversheet

Instructions:

In accordance with Title 3 Chapter 25 of the Vermont Statutes Annotated and the “Rule on Rulemaking” ([CVR 04-000-001](#)) adopted by the Office of the Secretary of State, this filing will be considered complete upon filing and acceptance of these forms and enclosures with the Office of the Secretary of State, and the Legislative Committee on Administrative Rules.

All forms shall be submitted to the Office of the Secretary of State, no later than 3:30 pm on the last scheduled day of the work week.

The data provided in text areas of Proposed Filing Coversheet will be used to generate a notice of rulemaking in the portal of “Proposed Rule Postings” online, and the newspapers of record. Publication of notices will be charged back to the promulgating agency.

**PLEASE REMOVE ANY COVERSHEET OR FORM NOT
REQUIRED WITH THE CURRENT FILING BEFORE DELIVERY!**

Certification Statement: As the adopting Authority of this rule (see 3 V.S.A. § 801 (b) (11) for a definition), I approve the contents of this filing entitled:

DLL CVR 01-130-001 Proposed Update

_____/s/ Martin Manahan_____, on _____
(signature) (date)

Printed Name and Title:

Chairman, Vermont Board of Liquor and Lottery

RECEIVED BY: _____

- ☐ Coversheet
- ☐ Adopting Page
- ☐ Economic Impact Analysis
- ☐ Environmental Impact Analysis
- ☐ Strategy for Maximizing Public Input
- ☐ Scientific Information Statement (if applicable)
- ☐ Incorporated by Reference Statement (if applicable)
- ☐ Clean text of the rule (Amended text without annotation)
- ☐ Annotated text (Clearly marking changes from previous rule)
- ☐ ICAR Filing Confirmed

1. TITLE OF RULE FILING:

DLL CVR 01-130-001 Proposed Update

2. ADOPTING AGENCY:

Vermont Department of Liquor and Lottery

3. PRIMARY CONTACT PERSON:

(A PERSON WHO IS ABLE TO ANSWER QUESTIONS ABOUT THE CONTENT OF THE RULE).

Name: Skyler Genest

Agency: Vermont Department of Liquor and Lottery

Mailing Address: 1311 US Rt. 302, Barre VT 05641

Telephone: 802-477-2429 Fax: 802-479-4294

E-Mail: skyler.genest@vermont.gov

Web URL *(WHERE THE RULE WILL BE POSTED)*:

<https://vtlottery.com/about/rules>

4. SECONDARY CONTACT PERSON:

(A SPECIFIC PERSON FROM WHOM COPIES OF FILINGS MAY BE REQUESTED OR WHO MAY ANSWER QUESTIONS ABOUT FORMS SUBMITTED FOR FILING IF DIFFERENT FROM THE PRIMARY CONTACT PERSON).

Name: Mike Ferrant

Agency: Vermont Department of Liquor and Lottery

Mailing Address: 1311 US Rt. 302, Barre VT 05641

Telephone: 801-798-6759 Fax: 8024794294

E-Mail: mike.ferrant@vermont.gov

5. RECORDS EXEMPTION INCLUDED WITHIN RULE:

(DOES THE RULE CONTAIN ANY PROVISION DESIGNATING INFORMATION AS CONFIDENTIAL; LIMITING ITS PUBLIC RELEASE; OR OTHERWISE, EXEMPTING IT FROM INSPECTION AND COPYING?) No

IF YES, CITE THE STATUTORY AUTHORITY FOR THE EXEMPTION:

N/A

PLEASE SUMMARIZE THE REASON FOR THE EXEMPTION:

N/A

6. LEGAL AUTHORITY / ENABLING LEGISLATION:

(THE SPECIFIC STATUTORY OR LEGAL CITATION FROM SESSION LAW INDICATING WHO THE ADOPTING ENTITY IS AND THUS WHO THE SIGNATORY SHOULD BE. THIS SHOULD BE A SPECIFIC CITATION NOT A CHAPTER CITATION).

31 V.S.A. § 651

7. EXPLANATION OF HOW THE RULE IS WITHIN THE AUTHORITY OF THE AGENCY:

These rules will govern the operation of the State Lottery, to include: Types of Lotteries to be conducted, Lottery product sales locations, Methods for sale, Manner of compensation for sales agents, and the Manner of selecting winning tickets.

8. CONCISE SUMMARY (150 WORDS OR LESS):

The proposed rule change to CVR 01-130-001 updates Vermont's Lottery regulations to align with statutory changes following the consolidation of the Departments of Liquor and Lottery. It replaces outdated references (e.g., "Director" to "Commissioner," "Commission" to "Board"), expands the Commissioner's authority, clarifies licensing eligibility, and outlines updated conditions for license suspension or revocation. The revisions introduce new definitions, streamline administrative procedures, and reinforce consumer protections—such as prohibiting prize payouts to minors and requiring conspicuous license display. These changes modernize the rules to reflect current business practices and statutory authority.

9. EXPLANATION OF WHY THE RULE IS NECESSARY:

The proposed rule change is necessary to modernize and align Vermont Lottery regulations with current law and operational reality. Since the 2016 version of CVR 01-130-001, significant statutory changes—particularly the consolidation of the Departments of Liquor and Lottery—have created inconsistencies between the rule and Title 31 of the Vermont Statutes. The update corrects outdated terminology, clarifies regulatory authority, and enhances the Commissioner's ability to enforce compliance and protect public integrity. It also addresses practical issues in licensing, ticket sales, prize redemption, and retailer conduct, ensuring the rule reflects modern business practices, improves operational efficiency, and upholds public trust in the Lottery system.

10. EXPLANATION OF HOW THE RULE IS NOT ARBITRARY AS DEFINED IN 3 V.S.A. § 801(b)(13)(A):

The proposed rule is not arbitrary under the definition provided in 3 V.S.A. § 801(13) (A) for the following reasons:

1. Factual Basis Exists (i):

The proposed changes are grounded in identifiable statutory changes including the consolidation of the Department of Liquor and Lottery under Act 1 and amendments to Title 31. These statutory developments created inconsistencies requiring correction through rulemaking. Additionally, operational needs (e.g., enforcing license conditions, modernizing prize validation) provide further factual support.

2. Rational Connection (ii):

The updates are tied to the need for consistent terminology, improved regulatory clarity, and effective enforcement. For example, expanding the Commissioner's authority over license suspension is rationally connected to the need for swift action to protect public welfare and ensure accountability.

3. Reasonable Basis (iii):

A reasonable person would understand that outdated or conflicting rules reduce regulatory effectiveness.

**11. LIST OF PEOPLE, ENTERPRISES AND GOVERNMENT ENTITIES
AFFECTED BY THIS RULE:**

- Vermont Lottery players (general public)
- Individuals seeking to become licensed Lottery agents
- Existing Lottery Sales Agents and their employees
- Minors (explicit protections added regarding sales and prize redemption)
- Retail businesses licensed to sell Vermont Lottery products (e.g., convenience stores, grocery stores, gas stations)
- Corporations or partnerships applying for or holding Lottery licenses
- Third-party vendors providing equipment, services, or marketing support to the Lottery
- Insurance companies involved in covering losses from stolen tickets
- Vermont Department of Liquor and Lottery (DLL)
- Board of Liquor and Lottery
- Vermont Department of Taxes (for licensee tax compliance checks)
- Vermont Department of Labor (for unemployment insurance compliance)

- Vermont Agency of Human Services – Child Support Division (for licensee compliance checks)
- Local law enforcement agencies (ticket theft/loss reporting)
- Vermont Secretary of State (rule filing and publica

12. BRIEF SUMMARY OF ECONOMIC IMPACT (150 WORDS OR LESS):

The proposed rule changes have minimal economic impact overall. For Lottery Sales Agents—many of whom are small businesses—there may be minor administrative costs related to updated license agreements, recordkeeping, and display requirements. However, these are offset by increased clarity, streamlined procedures, and the removal of outdated obligations, such as installation deposits. The Department of Liquor and Lottery benefits from improved operational efficiency, clearer enforcement authority, and alignment with current statutes, reducing legal and administrative risk. The public benefits from enhanced consumer protections and more transparent rules. No new fees are introduced, and the proposed changes do not impose significant financial burdens on any category of stakeholders.

13. A HEARING WILL BE SCHEDULED.

IF A HEARING WILL NOT BE SCHEDULED, PLEASE EXPLAIN WHY.
N/A

14. HEARING INFORMATION

(THE FIRST HEARING SHALL BE NO SOONER THAN 30 DAYS FOLLOWING THE POSTING OF NOTICES ONLINE).

IF THIS FORM IS INSUFFICIENT TO LIST THE INFORMATION FOR EACH HEARING, PLEASE ATTACH A SEPARATE SHEET TO COMPLETE THE HEARING INFORMATION NEEDED FOR THE NOTICE OF RULEMAKING.

Date: 9/22/2025
Time: 11:00 AM
Street Address: 1311 US Rt. 302, Barre VT 05641
Zip Code: 05641
URL for Virtual: <https://tinyurl.com/4s9caj2a>

Date:

Time: AM

Street Address:

Zip Code:

URL for Virtual:

Date:

Time: AM

Street Address:

Zip Code:

URL for Virtual:

Date:

Time: AM

Street Address:

Zip Code:

URL for Virtual:

15. DEADLINE FOR COMMENT (NO EARLIER THAN 7 DAYS FOLLOWING LAST HEARING): 10/2/2025

16. KEYWORDS (PLEASE PROVIDE AT LEAST 3 KEYWORDS OR PHRASES TO AID IN THE SEARCHABILITY OF THE RULE NOTICE ONLINE).

Vermont Lottery Rule Update

CVR 01-130-001 Amendment

Department of Liquor and Lottery Regulation Change

Vermont Lottery Sales Agent / Licensing Rules

Vermont Lottery Administrative Rule Revision

Final Proposed Filing - Coversheet

Instructions:

In accordance with Title 3 Chapter 25 of the Vermont Statutes Annotated and the “Rule on Rulemaking” adopted by the Office of the Secretary of State, this filing will be considered complete upon filing and acceptance of these forms with the Office of the Secretary of State, and the Legislative Committee on Administrative Rules.

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**PLEASE REMOVE ANY COVERSHEET OR FORM NOT
REQUIRED WITH THE CURRENT FILING BEFORE DELIVERY!**

Certification Statement: As the adopting Authority of this rule (see 3 V.S.A. § 801 (b) (11) for a definition), I approve the contents of this filing entitled:

DLL CVR 01-130-001 Proposed Update

_____, on _____
(signature) (date)

Printed Name and Title:

Chairman, Vermont Board of Liquor and Lottery

RECEIVED BY: _____

- ☐ Coversheet
- ☐ Adopting Page
- ☐ Economic Impact Analysis
- ☐ Environmental Impact Analysis
- ☐ Strategy for Maximizing Public Input
- ☐ Scientific Information Statement (if applicable)
- ☐ Incorporated by Reference Statement (if applicable)
- ☐ Clean text of the rule (Amended text without annotation)
- ☐ Annotated text (Clearly marking changes from previous rule)
- ☐ ICAR Minutes
- ☐ Copy of Comments
- ☐ Responsiveness Summary

1. TITLE OF RULE FILING:

DLL CVR 01-130-001 Proposed Update

2. PROPOSED NUMBER ASSIGNED BY THE SECRETARY OF STATE

P

3. ADOPTING AGENCY:

Vermont Department of Liquor and Lottery

4. PRIMARY CONTACT PERSON:

(A PERSON WHO IS ABLE TO ANSWER QUESTIONS ABOUT THE CONTENT OF THE RULE).

Name: Skyler Genest

Agency: Vermont Department of Liquor and Lottery

Mailing Address: 1311 US Rt. 302, Barre VT 05641

Telephone: 802-477-2429 Fax: 802-479-4294

E-Mail: skyler.genest@vermont.gov

Web URL *(WHERE THE RULE WILL BE POSTED)*:

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Name: Mike Ferrant

Agency: Vermont Department of Liquor and Lottery

Mailing Address: 1311 US Rt. 302, Barre VT 05641

Telephone: 801-798-6759 Fax: 8024794294

E-Mail: mike.ferrant@vermont.gov

6. RECORDS EXEMPTION INCLUDED WITHIN RULE:

(DOES THE RULE CONTAIN ANY PROVISION DESIGNATING INFORMATION AS CONFIDENTIAL; LIMITING ITS PUBLIC RELEASE; OR OTHERWISE, EXEMPTING IT FROM INSPECTION AND COPYING?) No

IF YES, CITE THE STATUTORY AUTHORITY FOR THE EXEMPTION:

N/A

PLEASE SUMMARIZE THE REASON FOR THE EXEMPTION:

N/A

7. LEGAL AUTHORITY / ENABLING LEGISLATION:

(THE SPECIFIC STATUTORY OR LEGAL CITATION FROM SESSION LAW INDICATING WHO THE ADOPTING ENTITY IS AND THUS WHO THE SIGNATORY SHOULD BE. THIS SHOULD BE A SPECIFIC CITATION NOT A CHAPTER CITATION).

31 V.S.A. § 651

8. EXPLANATION OF HOW THE RULE IS WITHIN THE AUTHORITY OF THE AGENCY:

These rules will govern the operation of the State Lottery, to include: Types of Lotteries to be conducted, Lottery product sales locations, Methods for sale, Manner of compensation for sales agents, and the Manner of selecting winning tickets.

9. THE FILING HAS NOT CHANGED SINCE THE FILING OF THE PROPOSED RULE.

10. THE AGENCY HAS INCLUDED WITH THIS FILING A LETTER EXPLAINING IN DETAIL WHAT CHANGES WERE MADE, CITING CHAPTER AND SECTION WHERE APPLICABLE.

11. SUBSTANTIAL ARGUMENTS AND CONSIDERATIONS WERE NOT RAISED FOR OR AGAINST THE ORIGINAL PROPOSAL.

12. THE AGENCY HAS INCLUDED COPIES OF ALL WRITTEN SUBMISSIONS AND SYNOPSES OF ORAL COMMENTS RECEIVED.

13. THE AGENCY HAS INCLUDED A LETTER EXPLAINING IN DETAIL THE REASONS FOR THE AGENCY'S DECISION TO REJECT OR ADOPT THEM.

14. CONCISE SUMMARY (150 WORDS OR LESS):

The proposed rule change to CVR 01-130-001 updates Vermont's Lottery regulations to align with statutory changes following the consolidation of the Departments of Liquor and Lottery. It replaces outdated references (e.g., "Director" to "Commissioner," "Commission" to "Board"), expands the Commissioner's authority, clarifies licensing eligibility, and outlines updated conditions for license suspension or revocation. The revisions introduce new definitions, streamline administrative procedures, and reinforce consumer protections—such as prohibiting prize payouts to minors and requiring conspicuous license display. These changes modernize the rules to reflect current business practices and statutory authority.

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consolidation of the Departments of Liquor and Lottery—have created inconsistencies between the rule and Title 31 of the Vermont Statutes. The update corrects outdated terminology, clarifies regulatory authority, and enhances the Commissioner’s ability to enforce compliance and protect public integrity. It also addresses practical issues in licensing, ticket sales, prize redemption, and retailer conduct, ensuring the rule reflects modern business practices, improves operational efficiency, and upholds public trust in the Lottery system

16. EXPLANATION OF HOW THE RULE IS NOT ARBITRARY:

The proposed rule is not arbitrary under the definition provided in 3 V.S.A. § 801(13) (A) for the following reasons:

1. Factual Basis Exists (i):

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2. Rational Connection (ii):

The updates are tied to the need for consistent terminology, improved regulatory clarity, and effective enforcement. For example, expanding the Commissioner’s authority over license suspension is rationally connected to the need for swift action to protect public welfare and ensure accountability.

3. Reasonable Basis (iii):

A reasonable person would understand that outdated or conflicting rules reduce regulatory effectiveness.

17. LIST OF PEOPLE, ENTERPRISES AND GOVERNMENT ENTITIES AFFECTED BY THIS RULE:

- Vermont Lottery players (general public)
- Individuals seeking to become licensed Lottery agents
- Existing Lottery Sales Agents and their employees

- Minors (explicit protections added regarding sales and prize redemption)
- Retail businesses licensed to sell Vermont Lottery products (e.g., convenience stores, grocery stores, gas stations)
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- Insurance companies involved in covering losses from stolen tickets
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- Vermont Department of Taxes (for licensee tax compliance checks)
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- Vermont Secretary of State (rule filing and publica

18. BRIEF SUMMARY OF ECONOMIC IMPACT (150 WORDS OR LESS):

The proposed rule changes have minimal economic impact overall. For Lottery Sales Agents—many of whom are small businesses—there may be minor administrative costs related to updated license agreements, recordkeeping, and display requirements. However, these are offset by increased clarity, streamlined procedures, and the removal of outdated obligations, such as installation deposits. The Department of Liquor and Lottery benefits from improved operational efficiency, clearer enforcement authority, and alignment with current statutes, reducing legal and administrative risk. The public benefits from enhanced consumer protections and more transparent rules. No new fees are introduced, and the proposed changes do not impose significant financial burdens on any category of stakeholders.

19. A HEARING WAS HELD.

20. HEARING INFORMATION

(THE FIRST HEARING SHALL BE NO SOONER THAN 30 DAYS FOLLOWING THE POSTING OF NOTICES ONLINE).

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Date: 9/22/2025

Time: 11:00 AM

Street Address: 1311 US Rt. 302, Barre VT 05641

Zip Code: 05641

URL for Virtual: <https://tinyurl.com/4s9caj2a>

Date:

Time: AM

Street Address:

Zip Code:

URL for Virtual:

Date:

Time: AM

Street Address:

Zip Code:

URL for Virtual:

Date:

Time: AM

Street Address:

Zip Code:

URL for Virtual:

21. DEADLINE FOR COMMENT (NO EARLIER THAN 7 DAYS FOLLOWING LAST HEARING):

10/2/2025

KEYWORDS (PLEASE PROVIDE AT LEAST 3 KEYWORDS OR PHRASES TO AID IN THE SEARCHABILITY OF THE RULE NOTICE ONLINE).

Vermont Lottery Rule Update

CVR 01-130-001 Amendment

Department of Liquor and Lottery Regulation Change

Vermont Lottery Sales Agent / Licensing Rules

Vermont Lottery Administrative Rule Revision

Adopted Filing – Coversheet

Instructions:

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REQUIRED WITH THE CURRENT FILING BEFORE DELIVERY!**

Certification Statement: As the adopting Authority of this rule (see 3 V.S.A. § 801 (b) (11) for a definition), I approve the contents of this filing entitled:

DLL CVR 01-130-001 Proposed Update

_____, on _____
(signature) (date)

Printed Name and Title:

Chairman, Vermont Board of Liquor and Lottery

RECEIVED BY: _____

- ☐ Coversheet
- ☐ Adopting Page
- ☐ Clean text of the rule (Amended text without annotation)
- ☐ Letter regarding changes to the final proposed

1. TITLE OF RULE FILING:

DLL CVR 01-130-001 Proposed Update

2. PROPOSED NUMBER ASSIGNED BY THE SECRETARY OF STATE

P

3. ADOPTING AGENCY:

Vermont Department of Liquor and Lottery

4. RECORDS EXEMPTION INCLUDED WITHIN RULE:

(DOES THE RULE CONTAIN ANY PROVISION DESIGNATING INFORMATION AS CONFIDENTIAL; LIMITING ITS PUBLIC RELEASE; OR OTHERWISE, EXEMPTING IT FROM INSPECTION AND COPYING?) No

IF YES, CITE THE STATUTORY AUTHORITY FOR THE EXEMPTION:

N/A

PLEASE SUMMARIZE THE REASON FOR THE EXEMPTION:

N/A

5. LEGAL AUTHORITY / ENABLING LEGISLATION:

(THE SPECIFIC STATUTORY OR LEGAL CITATION FROM SESSION LAW INDICATING WHO THE ADOPTING ENTITY IS AND THUS WHO THE SIGNATORY SHOULD BE. THIS SHOULD BE A SPECIFIC CITATION NOT A CHAPTER CITATION).

31 V.S.A. § 651

6. THE FILING HAS NOT CHANGED SINCE THE FILING OF THE FINAL PROPOSED RULE.

7. THE AGENCY HAS INCLUDED WITH THIS FILING A LETTER EXPLAINING IN DETAIL WHAT CHANGES WERE MADE, CITING CHAPTER AND SECTION WHERE APPLICABLE, INCLUDING CHANGES IN ECONOMIC IMPACT.

8. THE LEGISLATIVE COMMITTEE ON ADMINISTRATIVE RULES DID NOT OBJECT TO THE FINAL PROPOSAL.

9. PROCEDURAL HISTORY OF ADOPTION:

ICAR Filing:

Proposal Filed with Office of the Secretary of State:

Notices Posted Online: 8/20/2025

Notices Published in the Newspapers of Record: 8/28/2025

A Hearing WAS Held.

Hearings Held (*PLEASE USE ADDITIONAL SHEETS TO PROVIDE THE DATE, TIME, AND LOCATION OF ALL HEARINGS, IF THIS FORM IS INSUFFICIENT TO LIST ALL HEARINGS HELD*):

Date: 9/22/2025

Time: 11:00 AM

Street Address: 1311 US Rt. 302, Barre VT 05641

Zip Code: 05641

URL for Virtual: <https://tinyurl.com/4s9caj2a>

Date:

Time: AM

Street Address:

Zip Code:

URL for Virtual:

Date:

Time: AM

Street Address:

Zip Code:

URL for Virtual:

Date:

Time: AM

Street Address:

Zip Code:

URL for Virtual:

Deadline for Public Comment: 10/2/2025

Final Proposal —

Filed with Secretary of State:

Filed with LCAR:

Dates of LCAR Review: , , , ,

Adopted Rule —

Filed with Secretary of State:

Filed with LCAR:

10. EFFECTIVE DATE:

(A RULE MAY TAKE EFFECT 15 DAYS AFTER ADOPTION IS COMPLETE OR AT A LATER TIME PROVIDED IN THE TEXT OF THE RULE SEE 3 V.S.A. §845(d) FOR DETAILS).

Adopting Page

Instructions:

This form must accompany each filing made during the rulemaking process:

Note: To satisfy the requirement for an annotated text, an agency must submit the entire rule in annotated form with proposed and final proposed filings. Filing an annotated paragraph or page of a larger rule is not sufficient. Annotation must clearly show the changes to the rule.

When possible, the agency shall file the annotated text, using the appropriate page or pages from the Code of Vermont Rules as a basis for the annotated version. New rules need not be accompanied by an annotated text.

1. TITLE OF RULE FILING:

DLL CVR 01-130-001 Proposed Update

2. ADOPTING AGENCY:

Vermont Department of Liquor and Lottery

3. TYPE OF FILING (*PLEASE CHOOSE THE TYPE OF FILING FROM THE DROPDOWN MENU BASED ON THE DEFINITIONS PROVIDED BELOW*):

- **AMENDMENT** - Any change to an already existing rule, even if it is a complete rewrite of the rule, it is considered an amendment if the rule is replaced with other text.
- **NEW RULE** - A rule that did not previously exist even under a different name.
- **REPEAL** - The removal of a rule in its entirety, without replacing it with other text.

This filing is **AN AMENDMENT OF AN EXISTING RULE** .

4. LAST ADOPTED (*PLEASE PROVIDE THE SOS LOG#, TITLE AND EFFECTIVE DATE OF THE LAST ADOPTION FOR THE EXISTING RULE*):

March 17, 2016 Secretary of State Rule Log #16-006

Economic Impact Analysis

Instructions:

In completing the economic impact analysis, an agency analyzes and evaluates the anticipated costs and benefits to be expected from adoption of the rule; estimates the costs and benefits for each category of people enterprises and government entities affected by the rule; compares alternatives to adopting the rule; and explains their analysis concluding that rulemaking is the most appropriate method of achieving the regulatory purpose. If no impacts are anticipated, please specify “No impact anticipated” in the field.

Rules affecting or regulating schools or school districts must include cost implications to local school districts and taxpayers in the impact statement, a clear statement of associated costs, and consideration of alternatives to the rule to reduce or ameliorate costs to local school districts while still achieving the objectives of the rule (see 3 V.S.A. § 832b for details).

Rules affecting small businesses (excluding impacts incidental to the purchase and payment of goods and services by the State or an agency thereof), must include ways that a business can reduce the cost or burden of compliance or an explanation of why the agency determines that such evaluation isn’t appropriate, and an evaluation of creative, innovative or flexible methods of compliance that would not significantly impair the effectiveness of the rule or increase the risk to the health, safety, or welfare of the public or those affected by the rule.

1. TITLE OF RULE FILING:

DLL CVR 01-130-001 Proposed Update

2. ADOPTING AGENCY:

Vermont Department of Liquor and Lottery

3. CATEGORY OF AFFECTED PARTIES:

LIST CATEGORIES OF PEOPLE, ENTERPRISES, AND GOVERNMENTAL ENTITIES POTENTIALLY AFFECTED BY THE ADOPTION OF THIS RULE AND THE ESTIMATED COSTS AND BENEFITS ANTICIPATED:

- **Retailers/Sales Agents:** May incur minor administrative adjustments for compliance (e.g., conspicuous license display, updated agreements).
- **General Public:** Gains clarity and protection from updated eligibility, payout, and redemption provisions (e.g., age-restricted claims, clearer license revocation grounds).

- State Government: Administrative improvements, better enforcement authority, and enhanced policy alignment reduce legal and regulatory risk.

4. **IMPACT ON SCHOOLS:**

INDICATE ANY IMPACT THAT THE RULE WILL HAVE ON PUBLIC EDUCATION, PUBLIC SCHOOLS, LOCAL SCHOOL DISTRICTS AND/OR TAXPAYERS CLEARLY STATING ANY ASSOCIATED COSTS:

No impact anticipated.

5. **ALTERNATIVES: CONSIDERATION OF ALTERNATIVES TO THE RULE TO REDUCE OR AMELIORATE COSTS TO LOCAL SCHOOL DISTRICTS WHILE STILL ACHIEVING THE OBJECTIVE OF THE RULE.**

No impact anticipated

6. **IMPACT ON SMALL BUSINESSES:**

INDICATE ANY IMPACT THAT THE RULE WILL HAVE ON SMALL BUSINESSES (EXCLUDING IMPACTS INCIDENTAL TO THE PURCHASE AND PAYMENT OF GOODS AND SERVICES BY THE STATE OR AN AGENCY THEREOF):

Minor impact. Retailers (many of whom are small businesses) may need to update internal procedures or agreements but benefit from streamlined processes, clearer eligibility rules, and fewer ambiguities

7. **SMALL BUSINESS COMPLIANCE: EXPLAIN WAYS A BUSINESS CAN REDUCE THE COST/BURDEN OF COMPLIANCE OR AN EXPLANATION OF WHY THE AGENCY DETERMINES THAT SUCH EVALUATION ISN'T APPROPRIATE.**

The Department has minimized new burdens by removing unnecessary procedures and clarifying roles. Compliance cost is further reduced by providing resources and communication during implementation by the Department's Education Division.

8. **COMPARISON:**

COMPARE THE IMPACT OF THE RULE WITH THE ECONOMIC IMPACT OF OTHER ALTERNATIVES TO THE RULE, INCLUDING NO RULE ON THE SUBJECT OR A RULE HAVING SEPARATE REQUIREMENTS FOR SMALL BUSINESS:

No rule adoption would preserve outdated structures inconsistent with statute. Alternative approaches (e.g., informal policy memos) lack enforceability. This update balances statutory alignment and operational practicality.

9. SUFFICIENCY: *DESCRIBE HOW THE ANALYSIS WAS CONDUCTED, IDENTIFYING RELEVANT INTERNAL AND/OR EXTERNAL SOURCES OF INFORMATION USED.*

Analysis was conducted by reviewing legislative changes (Act 1, 2018 Special Session), comparing 2016 rules to statutory authority under 31 VSA § 651, and incorporating internal legal counsel and operational feedback.

Environmental Impact Analysis

Instructions:

In completing the environmental impact analysis, an agency analyzes and evaluates the anticipated environmental impacts (positive or negative) to be expected from adoption of the rule; compares alternatives to adopting the rule; explains the sufficiency of the environmental impact analysis. If no impacts are anticipated, please specify “No impact anticipated” in the field.

Examples of Environmental Impacts include but are not limited to:

- Impacts on the emission of greenhouse gases
- Impacts on the discharge of pollutants to water
- Impacts on the arability of land
- Impacts on the climate
- Impacts on the flow of water
- Impacts on recreation
- Or other environmental impacts

1. TITLE OF RULE FILING:

DLL CVR 01-130-001 Proposed Update

2. ADOPTING AGENCY:

Vermont Department of Liquor and Lottery

3. GREENHOUSE GAS: *EXPLAIN HOW THE RULE IMPACTS THE EMISSION OF GREENHOUSE GASES (E.G. TRANSPORTATION OF PEOPLE OR GOODS; BUILDING INFRASTRUCTURE; LAND USE AND DEVELOPMENT, WASTE GENERATION, ETC.):*

No impact anticipated.

4. WATER: *EXPLAIN HOW THE RULE IMPACTS WATER (E.G. DISCHARGE / ELIMINATION OF POLLUTION INTO VERMONT WATERS, THE FLOW OF WATER IN THE STATE, WATER QUALITY ETC.):*

No impact anticipated.

5. LAND: *EXPLAIN HOW THE RULE IMPACTS LAND (E.G. IMPACTS ON FORESTRY, AGRICULTURE ETC.):*

No impact anticipated.

6. RECREATION: *EXPLAIN HOW THE RULE IMPACTS RECREATION IN THE STATE:*

No impact anticipated.

7. **CLIMATE:** *EXPLAIN HOW THE RULE IMPACTS THE CLIMATE IN THE STATE:*

No impact anticipated.

8. **OTHER:** *EXPLAIN HOW THE RULE IMPACT OTHER ASPECTS OF VERMONT'S ENVIRONMENT:*

No environmental impacts are expected

9. **SUFFICIENCY:** *DESCRIBE HOW THE ANALYSIS WAS CONDUCTED, IDENTIFYING RELEVANT INTERNAL AND/OR EXTERNAL SOURCES OF INFORMATION USED.*

Analysis is based on the content of the proposed rule, which pertains to administrative, operational, and licensing matters for the Lottery. There are no provisions involving land use, emissions, or ecological systems.

Public Input Maximization Plan

Instructions:

Agencies are encouraged to hold hearings as part of their strategy to maximize the involvement of the public in the development of rules. Please complete the form below by describing the agency's strategy for maximizing public input (what it did do, or will do to maximize the involvement of the public).

This form must accompany each filing made during the rulemaking process:

1. TITLE OF RULE FILING:

DLL CVR 01-130-001 Proposed Update

2. ADOPTING AGENCY:

Vermont Department of Liquor and Lottery

3. PLEASE DESCRIBE THE AGENCY'S STRATEGY TO MAXIMIZE PUBLIC INVOLVEMENT IN THE DEVELOPMENT OF THE PROPOSED RULE, LISTING THE STEPS THAT HAVE BEEN OR WILL BE TAKEN TO COMPLY WITH THAT STRATEGY:

- Public hearing held in person and virtually at the Department Board of Liquor and Lottery.
- Draft rules posted publicly on the DLL website.
- Comment period advertised via press release and retail agent communication portals.
- Targeted email outreach to licensed lottery agents and industry stakeholders

4. BEYOND GENERAL ADVERTISEMENTS, PLEASE LIST THE PEOPLE AND ORGANIZATIONS THAT HAVE BEEN OR WILL BE INVOLVED IN THE DEVELOPMENT OF THE PROPOSED RULE:

- Licensed Vermont Lottery Sales Agents
- Vermont Grocers Association
- Retailer Advisory Groups
- Internal Compliance and Legal Counsel
- Board of Liquor and Lottery

Scientific Information Statement

THIS FORM IS ONLY REQUIRED IF THE RULE RELIES ON SCIENTIFIC INFORMATION FOR ITS VALIDITY.

PLEASE REMOVE THIS FORM PRIOR TO DELIVERY IF IT DOES NOT APPLY TO THIS RULE FILING:

Instructions:

In completing the Scientific Information Statement, an agency shall provide a summary of the scientific information including reference to any scientific studies upon which the proposed rule is based, for the purpose of validity.

1. TITLE OF RULE FILING:

DLL CVR 01-130-001 Proposed Update

2. ADOPTING AGENCY:

Vermont Department of Liquor and Lottery

3. BRIEF EXPLANATION OF SCIENTIFIC INFORMATION:

Not Applicable - The proposed rule changes are administrative and operational in nature and do not rely on scientific data.

4. CITATION OF SOURCE DOCUMENTATION OF SCIENTIFIC INFORMATION:

Not Applicable - The proposed rule changes are administrative and operational in nature and do not rely on scientific data.

5. INSTRUCTIONS ON HOW TO OBTAIN COPIES OF THE SOURCE DOCUMENTS OF THE SCIENTIFIC INFORMATION FROM THE AGENCY OR OTHER PUBLISHING ENTITY:

Not Applicable - The proposed rule changes are administrative and operational in nature and do not rely on scientific data.

Incorporation by Reference

THIS FORM IS ONLY REQUIRED WHEN INCORPORATING MATERIALS BY REFERENCE. PLEASE REMOVE PRIOR TO DELIVERY IF IT DOES NOT APPLY TO THIS RULE FILING:

Instructions:

In completing the incorporation by reference statement, an agency describes any materials that are incorporated into the rule by reference and how to obtain copies.

This form is only required when a rule incorporates materials by referencing another source without reproducing the text within the rule itself (e.g., federal or national standards, or regulations).

Incorporated materials will be maintained and available for inspection by the Agency.

1. TITLE OF RULE FILING:

DLL CVR 01-130-001 Proposed Update

2. ADOPTING AGENCY:

Vermont Department of Liquor and Lottery

3. DESCRIPTION (*DESCRIBE THE MATERIALS INCORPORATED BY REFERENCE*):

N/A

4. FORMAL CITATION OF MATERIALS INCORPORATED BY REFERENCE:

N/A

5. OBTAINING COPIES: (*EXPLAIN WHERE THE PUBLIC MAY OBTAIN THE MATERIAL(S) IN WRITTEN OR ELECTRONIC FORM, AND AT WHAT COST*):

N/A

6. MODIFICATIONS (*PLEASE EXPLAIN ANY MODIFICATION TO THE INCORPORATED MATERIALS E.G., WHETHER ONLY PART OF THE MATERIAL IS ADOPTED AND IF SO, WHICH PART(S) ARE MODIFIED*):

N/A

Run Spell Check