

RMTC Security/Surveillance Committee Report

Subsequent to the International Summit on Race day Medication Dr. Lewis formed an ad hoc committee to address the following charges:

1. Review the work of the prior RMTC Security Committee
2. Recommend a security system adequate to protect the horses in the event of either (a) turning race day salix over to regulatory vets and/or (b) phased ban of race day medication.
3. Make a recommendation as to how this security system should be funded.

The following document represents the report of the RMTC Security/Surveillance committee to the RMTC Board of Directors on security techniques to protect horses from the inappropriate administration of medication on race day.

Background:

In 2007 the RMTC convened a Security Committee that created a “Security/Investigative Training Program” in order to identify and promote ‘best practices’ in backstretch security. This document included recommendations intended to demonstrate the racing industry’s intention to provide a strong, integrity-based racing environment meant to improve the overall quality of racing, the perception that racing is being conducted honestly and improve the racing product to the wagering public. Further, it would foster the cooperation of most racing participants to assist investigators in security matters.

This committee suggested that a strong backstretch security presence (a collaborative effort by track, state, TRPB and other law enforcement agencies) would prompt an attitude change among backstretch licensees who see improper activities to come forward and take greater personal responsibility in security matters. An environment driven by coordinated security/investigative professionalism must be in place for this to happen.

The following quote from that document is as relevant to our current situation as it was to the circumstances that led to the formation of that effort in 2007: “Public confidence in our sport is undermined by the perception that drugs can be used to enhance racing performance. Standards of integrity for racing have never been more important. The abuse of illegal medication threatens not only our long-term growth, but our survival as an industry. The future of our sport is at stake.”

Increased and improved pre-race security measures can potentially minimize or eliminate the administration of illegal drugs to racehorses. It is imperative that racehorse owners demand stringent security prior to a race, and the backstretch

personnel be educated as to the need for security procedures. It is equally important for racing associations to enforce these security procedures and to include language detailing them in stall applications.

Potential Recommendations for Security Procedures to secure horses on race day:

1. **Monitoring/Detention Barn:** Detention barns are the best and most effective way to prevent or reduce improper race day medication. All entries in at least two (2) randomly selected races per day be held in a detention barn for a minimum of eight (8) hours prior to post time. If the RMTC recommends a 24 hour medication ban, twenty four hours in a properly monitored barn prior to the race is the “gold standard” to prevent inappropriate administration of medication. Races should be selected by the stewards and/or the racing association and may include the stakes or featured race. Randomly selected horses could also be identified for inclusion in a monitoring barn by drawing numbers. At a minimum, one race per day should be designated on a random basis for detention barn coverage. All races would be eligible for detention barn designation, which would occur after entries were taken and then announced on the overnight. Recommendations for specifications for the detention facility are included in the TRPB document appended at the end of this committee report. Access to the monitoring/detention barn should be controlled by security to prevent unauthorized access to horses that would provide an opportunity for inappropriate medication administration.
2. **Receiving Barns:** Arrival time of a ship-in horse is the most important (but not the only) factor in preventing improper pre-race administrations. The closer the arrival is to race time, the greater the opportunity for improper pre-race administrations. Race tracks should have a receiving barn(s) with capacity sufficient to accommodate the maximum number of shippers on a given day/race card. The degree of security conditions/controls used for shippers at a receiving barn should be matched for horses stabled on the grounds so that the same racing conditions exist for all entrants. Security measures at receiving barns are necessary if improper pre-race administrations are to be prevented. There needs to be a workable balance in arrival time between the respective operations of tracks and horsemen. Horses should be required to be presented to the receiving barn a minimum of 8 hours prior to race time. Further specifications and recommendations for receiving barns are included in the appendix TRPB document. Access to

the receiving barn should be controlled by security to prevent unauthorized access to horses that would provide an opportunity for inappropriate medication administration.

3. **Camera Surveillance:** Digital cameras may be installed in every barn or at least “in today” stalls in order to monitor activities particularly during the hours prior to racing (in conjunction with roving patrols and spot-checking). These cameras would be connected to large-capacity hard drives and would need to be monitored by security personnel. There are many technical issues to be addressed with video camera surveillance and the technology is rapidly evolving. Camera surveillance could be used as part of an “earned surveillance program.
4. **“In-today” Stall Signs:** A sign that identifies a horse in a certain stall as an “in-today” horse should be displayed on the stall of every horse entered on the day’s card. These signs should be put on the stall the day before race day and security personnel should spot check barns during the 24 hour period before the race, particularly between the hours of 3 to 6 AM, and significant fines or suspensions to be levied if a horse is moved from the stall or if unauthorized persons enter the stall. The tattoo number, color and sex of the entered horse should be posted on the “in today” sign, along with a local 800 number for track security in order to facilitate reporting violations. Copies of a horse identifier’s list of entered horses with their tattoo numbers should be made available to security personnel who patrol the general barn area; to be used for checks of “in today” horses.
5. **Periodic Inspections:** Racing association security personnel should conduct random and periodic inspections of licensees physically present on racetrack grounds, to include trainers, assistant trainers, grooms, veterinarians, veterinarian technicians, and vendors. Inspections shall comply with association policies and procedures regarding predication, execution and scope of said inspections, as well as the inclusion of racing commission or other individuals authorized to participate or witness the inspection.
6. **Eight-Hour Rule:** All entered horses must be on the grounds of the racetrack, in either the detention/monitoring barn or at an identified stall with security personnel in place, no later than eight hours prior to post time. Access to these horses should be restricted for at least 8 hours before post-time by anyone other than certain authorized personnel. Horses that are not

on the grounds by the specified time prior to post time would be scratched with discretion given to stewards to consider extenuating circumstances (traffic or weather conditions not under the control of the horse's connections).

7. **Vet “ride-along” program:** In this program investigators or security personnel would accompany veterinarians during their rounds for the day, particularly between the hours of 3 to 6 AM. Wherever feasible or practical, different veterinarians should be selected for a “ride-along” program. Consideration should also be given to doing this with vendors on a periodic basis as well. This might best be used as a component of an “earned surveillance” program.
8. **Training of Security Personnel:** Racing associations should develop comprehensive training programs which enable backstretch security personnel to expand their knowledge and abilities in policing and securing the stable area. Associations should support and participate in available security training opportunities, such as those provided by the Thoroughbred Racing Protective Bureau (TRPB) and the Organization of Racing Investigators (ORI). These programs should promote use of “best practices” to secure horses on race day. Training programs should be incorporated into standards for NTRA accreditation of North American Racetracks.
9. **Earned Surveillance:** All horses racing from a stable that has repeated or egregious positive drug tests should be required to report to the detention barn (8) hours prior to post time, for a period of no less than 30 days. These stables would also qualify for increased scrutiny by security personnel. Licensees who have repeated or egregious violations would similarly qualify for increased scrutiny by security officers (e.g. “ride-along” program, use of video surveillance, increased random visits to the barn, or spot checks of licensees).
10. **Random Barn Inspections:** The barn of a trainer of a random horse in a random race once a week is inspected by track security with a horsemen's group representative to witness and a commission investigator to act.
11. **Reporting and Communication:** All participants in racing, and particularly those whose livelihoods bring them to the backstretch of a racetrack each day, have an opportunity to contribute to improving the integrity of our sport by reporting suspected untoward activity immediately to association security

or racing commission personnel, or TRPB, through its toll-free, anonymous tip line (1-866-TIP-TRPB). Association investigators should, through appropriate dissemination mechanisms such as TRPB, ensure information regarding alleged untoward activity on the part of licensees, improper race-day substances, or other useful or actionable intelligence gleaned during their race meeting, is shared amongst their peers and to racing commission investigators.

Critical Analysis of available Security Options:

1. Monitoring/Detention Barn:

- a. Strengths – This technique provides the “gold standard” for securing the horse prior to the race and is the only technique that can most reliably do so.
- b. Weaknesses – Some horses may not race to form because they are being held in an unfamiliar environment. A requirement to be in the facility 8 hours prior to race time places an extreme burden on those trainers entered in early races. For example, a horse entered in the first race may have to be in the barn by 4 AM. It is quite conceivable that the horse will need to be loaded and shipped from a training center or nearby racetrack at 2 AM or earlier to make that deadline. Experience in New York has shown that the requirement to be in the detention barn will significantly reduce the number of horses that will be entered to race. There is a significant cost to the trainer and passed along to the owner to have a handler remain with the horse in the detention facility. Short time intervals (less than 8 hours) provide opportunity to treat the horse on race day prior to arrival at the detention barn. The use of detention barns for selective or high purse level races minimizes this burden.

2. Receiving Barns:

- a. Strengths – Security at receiving barns that is comparable to detention facilities helps to provide a level playing field by addressing the inherent discrepancies in pre-race conditions for ship-in horses and horses stabled on the grounds.
- b. Weaknesses –It is virtually impossible to secure ship-in horses in the same way that horses on the grounds may be secured.

3. Camera Surveillance:

- a. Strengths – Supervision of horses can be achieved over large areas and for increased period of time, possibly avoiding the need to sequester horses in a detention barn. A few trained security persons can monitor a large number of barns/stalls from a remote location. Video records may be recorded for future review and use in investigations/prosecutions. Some video systems are capable of providing alarm functions (either covert or overt) as well as remotely activating exterior or interior lights to enhance security.
- b. Weaknesses – Cameras may malfunction and can be defeated by avoiding field of view or removing the horse from the stall (ostensibly for blacksmith work, for example). Cameras would need to be placed into the stalls of horses in order to provide appropriate surveillance of “in today” horses. Video surveillance is not currently in place and the costs of putting this system in place would likely represent a significant capital expense. Redundancy of hard drives will be required in order to provide backup for secure data storage. Surveillance cameras must be capable of providing clear detail of the faces of anyone entering the in today stall. Surveillance considerations include purchase and maintenance of hardware, staffing of the cameras and storage of the data.

4. In-today Horses:

- a. Strengths – Horses may remain in their natural environment and are more likely to perform up to their form. Trainers save the expense of having a groom dedicated to taking the horse to a detention barn. All licensees should be encouraged to report potential violations. Cell phones (with cameras) provide a unique technological opportunity to document and report possible violations. This security technique should be incorporated with an educational effort to enlist support and buy-in of all licensees on the backstretch of the racetrack. The presence of these signs reminds all licensees of the commitment to security.
- b. Weaknesses – If horses are not supervised, either by cameras or by security personnel, this technique will not reliably eliminate potential breaches of security by individuals who intend to administer inappropriate medication. There is increased opportunity provided to breach this system due to the decreased degree of direct observation.

5. Periodic Inspections:

- a. Strengths – Randomness of this technique leverages the effect on potential violators.
- b. Weaknesses – Randomness creates opportunities to breach security.

6. Eight-Hour Rule:

- a. Strengths – This technique requires that horses be placed in an environment where security can be more easily provided. Scratching horses that do not arrive on time encourages compliance.
- b. Weaknesses - A requirement to be in the facility 8 hours prior to race time places an extreme burden on those trainers entered in early races. For example, a horse entered in the first race may have to be in the barn by 4 AM. It is quite conceivable that the horse will need to be loaded and shipped from a training center or nearby racetrack at 2 AM or earlier to make that deadline.

7. Vet “ride-along” program:

- a. Strengths - Properly done, this technique provides an opportunity, not only to discourage inappropriate behavior by veterinarians or veterinary technicians, but encourages relationship building between trained investigators and veterinarians that could lead to increased collaborative efforts.
- b. Weaknesses – Improperly done, this technique will antagonize both parties and create an adversarial relationship. It is also labor-intensive. It is critical that the security officer not be overly-intrusive so as to disrupt the veterinary-client-patient relationship. Training of security personnel will be required with an emphasis placed upon establishing a collaborative rapport with good communication.

8. Training of Security Personnel:

- a. Strengths – Training increases the ability of security personnel to be more effective. Training resources are currently available and minimal cost.
- b. Weaknesses – Apathy toward security on the part of many racing associations.

9. Earned Surveillance:

- a. Strengths – This focuses surveillance in areas where the impact is likely to be increased. It also conveys the commitment of the security program to follow-up on egregious violators even after a first violation.
- b. Weakness – Cost. The cost of this surveillance should be imposed upon the violator.

10. Random Barn Inspections:

- a. Strengths – The randomness of this technique will have a deterrent effect upon potential violators. The presence of a horsemen's group representative and a racing commission official facilitates immediate action.
- b. Weaknesses – Improperly done, this technique will antagonize both parties and create an adversarial relationship. It is also labor-intensive. Training of security personnel will be required with an emphasis placed upon establishing a collaborative rapport with good communication. There needs to be an open line of communication established between investigators and stewards and commission officers regarding barn inspections. Investigators will need permission and authorization by the Stewards to perform these inspections and if the inspections are not properly conducted with commission officers present, they may compromise the investigation and will potentially embarrass or anger the Stewards and disrupt the important working relationship between security officers and the racing office.

11. Reporting and Communication:

- a. Strengths – Increased collaboration between association investigators, TRPB, and racing commission investigators will enhance overall security efforts in a more effective manner. The development and sharing of intelligence, while maintaining requisite confidentiality requirements, is essential toward proactively addressing security/integrity vulnerabilities.
- b. Weaknesses – Although the technical infrastructure for collecting, digitally cataloguing, and disseminating intelligence/investigative information is in place at TRPB for TRA-member racetrack association security departments, certain administrative and legal matters would need to be addressed before TRPB could expand services to all racing venues. Participants need to be mindful of legal pitfalls (FOI/PA requirements, due process, arm's-length relationships) when government and private sector investigators interact on an on-going basis (e.g., investigations).

Funding Security:

It is our belief that current economic pressures are the primary limiting factor in regulators' "appetite" for security. Typically, the state racing commission is charged with ensuring the integrity of racing in their jurisdiction. Creating a rule to eliminate race day medication without funding security amounts to an unfunded mandate. Having said that, we believe that security is everyone's responsibility. Trainers should participate by funding private barn security to protect their horses from tampering. Owners should participate by funding initiatives that will ensure a level playing field. A small portion of the money spent on race day medication could be devoted to security to ensure the level playing field. Tracks should participate by providing basic security of the facility. Veterinarians should participate by providing security of their medication and supplies and use proper medical waste procedures in order to ensure that needles and syringes are not made available to laymen or other individuals who would use them inappropriately to breach security and violate the rules of racing. The cost of meaningful race day security will be reduced to the degree that some or many of the necessary components may already be in place. Our goal should be to be maximally efficient with the resources that we have at hand. If testing efficiencies can be realized (e.g. outsourcing testing to accredited regional laboratories), some of that money could be diverted to support security. Re-allocation of funds currently used to fund security/testing efforts should be investigated.

The actual cost of security programs will vary with the protocols designed to meet the needs of individual racetrack facilities. Once the RMTC determines the parameters to be included in a model rule recommendation, a range of cost estimates can be provided.

Summary/Conclusions:

The fundamental objective of race-day security is to prevent the administration of inappropriate medication to horses entered to race that day. If adequate security and surveillance measures are put in place within 24 hours of racing, then the advantage of cheating goes away. One of the major challenges inherent in our diverse horse racing industry is how to provide similar and appropriate levels of security and supervision for horses that are stabled both on track and at off-track facilities. ALL horses would have to be on the track at 24 hours to make security equal for all.

Race-day Security recommendations must be adequate to enable enforcement of whatever model rules are recommended. It is counterintuitive and undermines the credibility of the racing industry to create a model rule that is unenforceable. A model rule to eliminate race day medication without security in place to enforce that rule is

simply “window dressing.” For example, if a model rule requires that horses not receive medication on race day, then effective security must be in place throughout the period defined as “race day.” Therefore it is critical at the start, to define the “race day” period. For example, requiring horses to report to a detention/monitoring barn 4 hours prior to a race will not secure them on “race day” if they are being treated in the barn area, at a training center or on the van prior to reporting to the detention/monitoring barn at the race track.

There is not a “one size fits all” specific strategy that will provide appropriate race-day security at all racing facilities. It is important to develop a strategic security plan as deemed appropriate by security/administrative officers based upon the unique facility and manpower requirements of a given venue. Nonetheless, minimum strategic concepts must be in place, employing a combination of the security techniques outlined above. The committee feels that uniformity of security policy among North American racing jurisdictions is critical to the success of our industry. At a minimum, a combination of a modest increase in race day security in combination with severe penalties for egregious or repeat violators should be encouraged in all jurisdictions.

It is extremely unlikely that any single recommendation option, in and of itself, will enable us to secure horses on race day. Rather a comprehensive security plan will need to be created for each racing facility. The culture of security and cooperation by licensees is a laudable goal, but will take years to cultivate and nurture. In the meantime, a strong commitment to physical security methods is needed to begin to achieve that goal.

Security works hand-in-hand with testing and enforcement. The key to the success of an effective security program is to enable racing officials to identify violators and prosecute them to the extent that the penalty for violation is significant enough to deter others from cheating. The racing association must have the option to seek the removal of a trainer or veterinarian from its grounds in the best interest of racing. National uniformity of penalties will be helpful to support security and consideration should be given to encourage legislatures to pass laws that make tampering with the outcome of a race (including the illegal drugging of racehorses) a felony offense. A horse with an egregious positive test should be prohibited from racing for a specified period of time in order to impose a significant penalty against the owner of the horse, not just the trainer. Although quality testing is critical to the elimination of race day medication, security is equally as important, since many of the medications that we seek to regulate are not currently detectable. Out-of-competition testing will play an increasing role in enforcement of medication rules in the future. Authorization for random out-of-competition testing should be included in license documents for owners and trainers and stall applications.

Reporting and communication is an extremely important component of any national policy and although the infrastructure for this is largely in place, the desire for collaboration is currently lacking. Commissions and racetracks are protective of their turf and often reluctant to share what may be perceived as security or integrity failures. This behavior must be discouraged and the value of reporting and communication must be emphasized and the practice encouraged by incorporating this strategy in a model rule.

If these fundamental strategic concepts are put in place, monitored and subjected to regular quality control review processes, security will be achieved to the degree supported by the political will of the regulatory body for a particular racing jurisdiction/facility.

Minimum Standards Recommended for increasing race-day security:

- Match requirements for race day security with the scope of model rule recommendations
- Provide security in receiving barns
- Use “in today” signage on stalls with emergency phone numbers to report violations
- Random barn inspections should be performed weekly
- Implementation of “earned security” procedures, including Vet “ride along” procedures, video surveillance and random inspections
- Severe penalties for repeat or egregious violations
- Create reporting and communication programs across all racing jurisdictions
- Promote use of TRPB tip line to reporting violations of racing rules in all racing jurisdictions

These minimum recommendations by no means represent what we consider to be the best practices for providing race day security. We recommend these standards as a starting point in order to provide a cost-effective program that will demonstrate a uniform commitment to meaningful security procedures across North America. As is the case with the NTRA Safety and Integrity Alliance protocol, security measures should be upgraded over time with the goal of continual improvement in mind.

“Best Practices” for race day security would employ a combination of the above recommendations and would likely include a secure monitoring barn for all horses to be housed prior to racing for the period specified in the language of a model rule.

Respectfully Submitted:

RMTC Security/Surveillance Committee

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APPENDIX:

The following is a reference document for the RMTC Board to review at its discretion. This document represents the work of the TRPB and has not been modified in any way. TRPB's recommendations as stated in this document reflect that which its TRA-member racetrack associations have previously been presented, and have incorporated, in varying degrees, into their security protocols. Portions of the content of this document have been incorporated into the body of the committee report.

