

**Health and Safety Guidelines for Reopening of Casino Operations**
(last updated September 30, 2020)

The purpose of this communication is to set forth minimum standards for a limited initial reopening of Indiana's casinos. This will be known as Phase One. Each casino wishing to participate in Phase One will be required to submit a detailed plan corresponding to each point below. Successful plans will include extensive detail regarding how each objective will be met, focus heavily on the health and safety of all employees and patrons, and serve to provide confidence to the public that gaming will commence in a measured and responsible manner under conditions now necessary during the COVID-19 pandemic. This communication solely sets forth the minimum standards. Casinos are not precluded from implementing procedures and policies in addition to, or more stringent, than those listed below.

COVID-19 Preparedness and Response Plans

Each casino must develop a COVID-19 Preparedness and Response Plan consistent with current Centers for Disease Control (CDC) and Occupational Safety and Health Administration (OSHA) recommendations, Indiana State Department of Health guidance, Governor Holcomb's executive orders and Indiana Gaming Commission (IGC) guidelines. Response plans must be submitted at least seven (7) days prior to any reopening. Prior to reopening, all casinos shall conduct a full cleaning and disinfecting of its facility in accordance with CDC and OSHA guidelines. Plan adherence should be included under the compliance department and subject to all customary reporting and IGC audits.

Training

Training programs to educate all employees regarding COVID-19, its symptoms, and measures required to limit its transmission, must be outlined in detail.

Daily Health Screening

Employees, patrons and vendors shall undergo a daily health screening. Casino plans shall detail procedures for implementing the daily health screening that will be conducted at points of ingress via greeters and signage. Screening questions, at a minimum, shall include the following: (1) Have you traveled to any CDC Level 3 Travel Warning Country or been in close contact with anyone who has traveled to those areas within the last 14 days?; (2) Have you had close contact with or cared for someone diagnosed with COVID-19 within the last 14 days?; and (3) Have you experienced any cold or flu-like symptoms in the last fourteen (14) days (fever, cough, chills, head ache, sore throat, new loss of sense of smell or taste, muscle pain, shortness of breath, or other respiratory problem)? Patrons, employees or vendors answering yes to any of the above questions should not be permitted access to the casino.

Employees

Employees should be instructed to stay at home if they do not feel well, and to contact a supervisor if they notice a co-worker or patron experiencing COVID-19 symptoms. Physical distancing and proper disinfecting procedures must also be enforced back of house, including but not limited to: employee dining rooms, lockers, entrances, pre-shift meetings and security podiums. Plans should also include detailed cleaning procedures for shared equipment and uniforms. Employees should undergo temperature checks upon arrival for each shift with an acceptable temperature of 100.4 degrees or under. Casinos shall not issue attendance “points” or discipline to employees who do not attend work due to experiencing COVID-19 symptoms, are subject to a mandated quarantine or have a positive COVID-19 diagnosis. Casinos shall be sensitive to the fact that incentives or bonuses tied to attendance may encourage employees to come to work while sick and may wish to be flexible in administering any such programs during this time.

Occupancy

Phase One occupancy shall be limited to the number of available gaming positions with implemented physical distancing plus 50%, or 50% of capacity, whichever is less. Casinos must demonstrate the ability to accurately count patrons and limit admittance as necessary to enforce the occupancy limit, this may include, for example, reservation and queuing systems. In circumstances where the casino has reached its capacity, efforts must be made to prevent patrons from congregating in violation of the six (6) foot physical distancing guideline.

Physical Distancing and Queuing

Based upon the recommendations of health authorities, physical distancing of six (6) feet for patrons not traveling together should be enforced in all areas of casino floors, including player’s club areas. It is the responsibility of each casino to increase the number of security officers and other employees per shift to provide appropriate support of this objective. Areas where interactions with casino employees may require less than six (6) feet of physical distancing should be assessed for the installation of clear barriers to reduce the potential for COVID-19 transmission. All queuing areas must have floor markings or other methods of identifying proper distancing.

Ingress and Egress

Effort should be made to segregate the points of ingress and egress in order to best ensure physical distancing in high traffic areas. Touchless doors and/or efforts made to reduce the touching of doors, should be implemented where possible. Disinfecting products must be available for patrons use at each point of ingress and egress and patrons must be required to use hand sanitizer before gaining admittance. Greeters shall be present at points of ingress and egress to ensure compliance with these guidelines and casino approved plans. Casinos shall acquire equipment which can be deployed to provide non-invasive temperature checks for patrons with an acceptable temperature of 100.4 degrees, or under, for admittance and procedures for managing patrons whose temperature exceeds 100.4 degrees.

Elevators, Escalators and Stairways

Where possible, elevators should be set to eliminate stops between the point of entry and the desired floor. No more than four (4) individuals not traveling together, should be permitted on an elevator at any time. Utilization of escalators and stairways must be monitored to ensure that individuals traveling in opposite directions are able to maintain physical distance. Appropriate signage must be in place and casino employees must be available to support compliance.

Air Quality

Each casino must outline measures taken to ensure air quality, including the utilization of high quality filtration and increasing the amount of fresh air inside facilities. Smoking should be limited to a designated area and casinos shall establish procedures to ensure physical distancing measures will be observed. Plumbing and HVAC systems should be inspected by appropriately qualified maintenance personnel.

Electronic Gaming Devices and Sportsbooks

Machines must be deactivated or taped off and chairs must be removed as necessary to ensure patrons are not within six (6) feet of each other while playing slot machines or electronic table games. Sportsbooks, including kiosks and betting windows, must also implement physical distancing guidelines.

Table Games

Table games will be limited to three (3) players each, roulette games to four (4) players each, poker games to five (5) players each and craps games to six (6) players each. Casino plans should extensively detail the appropriate disinfecting procedures to be utilized for cards, chips and dice. No smoking is permitted by patrons participating in table game activities. Casino employees must ensure patrons not participating in the activities do not congregate around table games, and over-the-shoulder play is not permitted.

Face Coverings and Identity Checks

Patrons must to wear a face covering at all times, except when seated at a restaurant or bar actively eating, drinking or smoking or when seated at a slot machine actively eating, drinking or smoking. In both cases, patrons must maintain appropriate physical distancing. Casinos must ensure patrons are not eating, drinking or smoking while “walking around” on property. Each plan shall include provisions requiring facial coverings and other appropriate personal protective equipment (PPE) for all casino employees to be worn at all times while on the casino floor. PPE should be provided at no cost to employees. Plans should detail how casinos will verify the identity of patrons wearing facial coverings prior to entering the gaming floor and at other times as required for certain transactions. Surveillance must record a facial shot of patrons. Casinos shall establish procedures to respond to patrons refusing to comply. Casinos shall make facial coverings available to patrons if it is requested. Resources to provide for the proper disposal of used PPE are required. Anticipated product need and due diligence in ensuring continuing availability of PPE shall be provided in the submitted plan. Casino properties are also subject to local face covering requirements, which may be more stringent than those required by Executive Order 20-37, and ongoing compliance with local orders is also required.

Signage and Other Safety Communication

Effectively communicating new casino policies and patron responsibilities will be key to a successful Phase One reopening. Each casino will need to outline the content and location of all communication. Information from the CDC, OSHA and State Department of Health regarding handwashing, need to stay home if sick, and other health information, must be displayed at each property in prominent areas.

Cleaning and Disinfection

Each casino must have detailed plans for the cleaning and disinfecting of all areas of the gaming floor. Every effort should be made to disinfect each machine as a patron ceases play there. Objects touched with high frequency, such as ATM's and counters, should be disinfected as often as feasible. Disinfecting products must be made available in all areas of the casino to enable patrons to disinfect frequently touched surfaces at their discretion, as well as hand sanitizer. Anticipated product need and due diligence in ensuring continuing availability of cleaning and disinfecting products shall be provided in the submitted plan.

In addition to enhanced regular cleaning and disinfecting, each plan should outline deep cleaning and disinfecting measures and the interval at which these activities will occur. Casinos may submit a request to reduce hours and scale back on operations based on less traffic or for purposes of sanitization efforts.

Waivers and Revised Internal Control Procedures

Each plan should include waiver requests, as well as revised internal controls, necessary to implement Phase One operations. If a casino believes any part of its plan should be treated as confidential, it should designate that particular section as "confidential" with a citation to the corresponding section under the Indiana Access to Public Records Act (IC 5-14-3). Additionally, pursuant to 68 IAC 11-1-3, casinos may designate their related internal controls "confidential" by stamping or otherwise marking the relevant pages.

Restaurants, Bars and Hotels

All restaurants, bars and hotels must adhere to requirements established by the State of Indiana, including physical distancing. Spas and other property amenities shall comply with all requirements imposed on similar businesses in Indiana.

Prohibited Phase One Activities

The following are prohibited during Phase One:

- Casino floor beverage service
- Concerts, nightclubs, live events and shows, unless approved by local health department and in accordance with Stage 5 guidance.
- Promotions and other activities likely to create challenges in meeting physical distancing requirements
- Valet service
- Buffets

Reporting

If a casino is informed or alerted of a confirmed case of COVID-19 at its property, whether patron or employee, it must notify and cooperate with the local health authorities. Plans should identify a casino property liaison to assist local health authorities with data sharing and contact tracing. In addition, casinos shall also detail specific disinfectant plans and procedures in the event notice is received of a COVID-19 positive test for an employee or patron, following their presence at a casino property.

Approval of Plans

The IGC will seek guidance from public health experts in evaluating submitted plans. In moving forward with a Phase One plan, casinos should be advised that reopening dates are subject to change as new data emerges. Limitations applicable to casinos imposed by local jurisdictions could impact a casino opening. Phase One guidance is also subject to revision as necessary. Gaming Enforcement Agents will assist in evaluating the execution of approved plans and additional requirements may be imposed on specific properties. Every effort will be made to provide adequate notice of revised requirements, but it is possible that changes will be made on an emergency basis in the interest of public health.

Execution of health and safety plans are the responsibility of the casino and casinos must have adequate resources to ensure effectiveness. Patrons and casinos staff with complaints will be directed to Indiana Occupational Safety and Health Administration (IOSHA).