



Health and Safety Guidelines for Casino Operations during the COVID-19 Outbreak
(last updated March 2, 2021)

The purpose of this communication is to set forth the minimum standards for operations at state-licensed casino properties during the COVID-19 outbreak. Casino operations shall be conducted in accordance with the county-based assessment system and color-coded county zone restrictions in order to mitigate and reduce the spread of COVID-19. Each casino is 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. Casinos are not precluded from implementing procedures and policies in addition to, or more stringent than, those listed below.

Below are the guidelines governing casino operations. When a casino county's community spread metric is greater than the blue zone, heightened restrictions and measures are addressed via amendment requirements noted at the end of this document.

COVID-19 Preparedness and Response Plans

Each casino must develop a COVID-19 Health and Safety 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. Casinos may be subject to additional measures given the unique environment presented at the casino properties. Plan adherence should be included under the compliance department and subject to all customary reporting and IGC audits.

Daily Health Screening and Temperature Checks

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 or signage. Casinos should, at a minimum, utilize the screening questions recommended by the CDC. Patrons, employees or vendors answering yes to any of the questions should not be permitted access to the casino.

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 temperatures exceed 100.4 degrees. Employees should undergo temperature checks upon arrival for each shift with an acceptable temperature of 100.4 degrees or under.

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. 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. Casinos shall ensure all employees receive ongoing and up-to-date training programs regarding COVID-19, its symptoms, and measures required to limit its transmission. Appropriate personal protective equipment (PPE) should be provided at no cost to employees.

Occupancy

Occupancy shall be limited to the number of available gaming positions with implemented physical distancing plus 75%, or 75% 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

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. Effort should be made to segregate the points of ingress and egress in order to best ensure physical distancing in high traffic areas

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. Plumbing and HVAC systems should be inspected by appropriately qualified maintenance personnel.

Electronic Gaming Devices, Sportsbooks, and Casino Cage

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. Bar top machines, including poker, are allowable with implemented physical distancing equivalent to slot machines. Sportsbooks, including kiosks, must also implement physical distancing guidelines. Betting and casino cage windows do not require six (6) feet distancing between casino employees provided the casino implements additional mitigation efforts, such as facial coverings and clear glass barriers between employees.

Table Games

Facial coverings must be worn at all times during participation in table game activities No smoking is permitted by patrons participating in table game. Casino employees must ensure patrons not participating in the activities do not congregate around table games, and over-the-shoulder play is not permitted.

Facial Coverings and Identity Checks

Patrons must to wear a facial 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 PPE for all casino employees to be worn at all times while on the casino floor.

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.

Signage and Other Safety Communication

Effectively communicating casino policies and patron responsibilities is key to a successful operation during the COVID-19 outbreak. 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. Disinfecting products and hand sanitizer must be made available to patrons in all areas of the casino.

Waivers and Revised Internal Control Procedures

Each plan should include waiver requests, as well as revised internal controls, necessary to implement these guidelines. 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, Hotels and Social Gatherings

All restaurants, bars and hotels must adhere to requirements established by the State of Indiana, including physical distancing. Buffets are prohibited. Spas and other property amenities shall comply with all requirements imposed on similar businesses in Indiana. All non-gaming social gathering and event limitations apply to casino properties. Promotions and other activities which could create challenges in meeting physical distancing requirements will be denied absent adequate measures and procedures to ensure compliance.

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.

Acceptance of Plans

Execution of health and safety plans are the responsibility of the casino and casinos must have adequate resources to ensure effectiveness. Casino staff with complaints will be directed to Indiana Occupational Safety and Health Administration (IOSHA). Patrons concerned with a business' compliance with local COVID mandates should direct those to the local health department.

Casinos shall engage in ongoing dialogue and partnership with local health departments. Local governments may impose more restrictive guidelines.

Yellow, Orange or Red Amendments

In an effort to counter the spread or impact of COVID-19 in the particular casino county, additional measures and restrictions, as outlined below, will be imposed for counties that are assessed within Yellow, Orange or Red Zones.

Casino counties must maintain a color-coded zone metric for two (2) consecutive weeks prior to implementing operational changes consistent with a lower level zone assessment. However, if a county zone metric increases to Yellow, Orange or Red, casinos shall implement operational changes within twenty-four (24) hours.

Yellow Zone Amendment

- Table games will be limited to three (3) players each (games that have different layout sizes that could allow for guest limits above what is stated here must be granted approval by the IGC before being utilized), roulette games to four (4) players each, poker games to five (5) players each and craps games to six (6) players each.
- Betting and cage windows require six (6) feet physical distancing between casino employees.
- Occupancy shall be limited to the number of available gaming positions with implemented physical distancing plus 50%, or 50% of capacity, whichever is less.

Orange Zone Amendment

- All Yellow Zone restrictions apply.
- Casino floor beverage service is prohibited.
- Self-service beverage stations are prohibited.
- Bar top machines are prohibited.
- Valet is prohibited.
- Casinos shall designate a segregated area away from the gaming area and walking paths for physically distanced eating, drinking, and smoking. All other portions of the gaming area, aside from adjacent restaurants while seated patrons are eating and drinking, shall require facial coverings at all times. Casino signage, overhead announcements and other measures to ensure compliance should be implemented

Red Zone Amendment

- All Yellow and Orange Zone restrictions apply.
- Patron capacity limitations imposed by the Yellow Zone calculation will be decreased by 15%.