Michigan Economic Recovery Council (MERC)

Health practices: Casinos

May 26th, 2020

The contents of this document are made available to you for informational purposes only and should not be construed as legal, financial or medical advice on any matter. This material may not reflect the most current COVID-19 developments and is subject to revision. In no event will Business Leaders for Michigan be liable for any decisions made or action taken in relation upon the information provided through this document.
Executive summary

Common set of practices for casino facilities

• Will be scalable for small business and large chains
• Will be easy to communicate and execute
• Will not be cost prohibitive

Supporting documentation to be aligned with CDC and FDA guidelines. In case of any conflict between any of the foregoing guidance or requirements, the strictest shall apply

There are a couple important considerations for casinos

• Due to direct customer interaction, ensuring safety and building trust is more difficult. This can be tackled partially by making safety practices highly visible to customers
• There are many shared items and frequent turnover of players, so organizations need to consider how they will reduce cross-contamination risk
• Many casinos may also have restaurants and hotels within their facility, in which case, the restaurant and hotel practices should be leveraged

*Document is meant as a guide; not exhaustive*
Across facility types, health practices fall into the following eight categories

<p>| | | | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>1</strong></td>
<td><strong>Response owners and plan</strong></td>
<td><strong>2</strong></td>
<td><strong>Facility entry and health check protocols</strong></td>
</tr>
<tr>
<td></td>
<td>Establish virus response team</td>
<td></td>
<td>What are the appropriate screening protocols?</td>
</tr>
<tr>
<td><strong>3</strong></td>
<td><strong>PPE requirements</strong></td>
<td><strong>4</strong></td>
<td><strong>Distancing</strong></td>
</tr>
<tr>
<td></td>
<td>What PPE is necessary in this environment? (Provide guidelines and PPE for different settings and roles)</td>
<td></td>
<td>How do we ensure we are maintaining appropriate distance across the facility?</td>
</tr>
<tr>
<td><strong>5</strong></td>
<td><strong>Cleaning</strong></td>
<td><strong>6</strong></td>
<td><strong>Case monitoring protocols</strong></td>
</tr>
<tr>
<td></td>
<td>What are the cleaning protocols and how do we communicate these effectively to employees?</td>
<td></td>
<td>How do we ensure we can respond quickly to a potential case?</td>
</tr>
<tr>
<td><strong>7</strong></td>
<td><strong>Facility/space temporary closure</strong></td>
<td><strong>8</strong></td>
<td><strong>Travel restrictions</strong></td>
</tr>
<tr>
<td></td>
<td>What is our response plan? (e.g., Block off areas of exposure to allow appropriate deep cleaning)</td>
<td></td>
<td>How do we handle employee essential and personal travel?</td>
</tr>
</tbody>
</table>

**Core practices (“must-haves”):** Practices that can be implemented more broadly across different sized organizations

**Next level implementation:** Recommended additional practices that provide better risk mitigation (for better equipped facilities)
Casinos can safeguard their facilities with health practices in the following focus areas

<table>
<thead>
<tr>
<th>Categories</th>
<th>Health practice overview</th>
</tr>
</thead>
</table>
| **1 Response owners and plan**    | Establish team or roles  
Define scope of team (e.g., manage implementation of practices and protocols)  
Communicate role of team and expectations to employees                                                                 |
| **2 Facility entry and health check protocols** | Reduce congestion at entry/exit points  
Screen staff health/exposure  
Screen customers  
Restrict entry of 3rd party suppliers and delivery                                                                 |
| **3 PPE requirements**            | Ensure PPE (masks, hand sanitizer) is stocked  
Establish standard PPE distribution methods and training  
Enforce facial covering usage in customer service and common spaces                                                                 |
| **4 Distancing**                  | Increase distancing for employee interaction (to customers and other employees) (e.g., physical barriers)  
Increase distancing for customer interaction  
Provide visual reinforcements (e.g., X’s, restrictions in elevator capacity) for distancing                                                                 |
| **5 Cleaning**                    | Conduct more frequent daily cleaning of all high touch areas and post protocols publicly  
Establish employee cleaning protocols and emphasize frequent hand washing (for all)  
Supply guidance and conduct audit checks for cleaning procedures (incl. deep cleaning)                                                                 |
| **6 Case monitoring protocols**   | Define protocol for symptomatic employees and customers  
Identify and contact exposed people; (e.g., provide symptom checking, guidance) to the extent feasible                                                                 |
| **7 Facility pause/shutdown**     | Enforce appropriate shut down/ pause and cleaning protocol for affected space  
Communicate protocol to employees and customers                                                                 |
| **8 Travel restrictions**         | Restrict business/personal travel for employees                                                                                                          |
## 1: Response owners and plan (health practices)

<table>
<thead>
<tr>
<th>Health practice overview</th>
<th>Core practices</th>
<th>Next level implementation for better equipped facilities</th>
</tr>
</thead>
</table>
| Establish team or roles  | **Designate single point of contact for COVID-19** response, depending on size of operation may also create COVID-19 response team (*could be existing role with expanded scope e.g., building manager, safety director*)  
  • Establish leader at each facility (e.g., manager, owner, safety) and coordinate with HR for employees (training, communications) | **Dedicate staff** to virus response team (sole focus)  
  **Establish PR/media** representative |
| Define scope of team (e.g., manage implementation of practices and protocols) | **Develop proper signage** for customers and employee confidence/adherence  
  Ensure operations, cleaning, distancing, etc. satisfy CDC recommendations when possible  
  Complete a daily **health checklist** (e.g., areas to clean pre-reopening – rooms, bathrooms etc.) | **Leverage/modify (or develop) existing training** and materials for employees  
  Ensure consistent implementation across locations |
| Communicate role of team and expectations to employees | Share notices both on-site and digitally, if possible to explain new policies to all employees  
  Share **clear timeline** for implementation  
  **Conduct employee training prior to reopening**  
  • Daily shift/stand-up protocols for updates on what may have changed, reminders on social distancing | **Develop virtual training** and send push alert to employees, require employees to take training before work (logins tracked) |
1: Response owners and plan (examples)

Establish team or roles

Example: Large casino

- General manager
  - Policy review and approval (All categories)
  - Emergency planning (Administrative)
  - Management reports (Administrative)
  - Information collection, consolidation, and reporting (Administrative)

- Administrative Support

- HSE, HS & Administration
  - Create policies and processes (All categories)
  - Internal Communication (Communication/Ed ucation/Training)
  - Interface with local government (Administrative)
  - Facility daily management (All categories)

- Commercial / Public Relations
  - Customer, supplier, and contractor communications (Administrative)
  - Evaluate business risk (Administrative)
  - Media/Social Media (Communication/Ed ucation/Training)

- Purchasing and Logistics
  - Ensure appropriate supplies for cleaning, disinfecting, and PPE (Cleaning/Disinfecting/PPE)
  - Manage risk from shopping and receiving materials (PPE Screening, Cleaning/Disinfecting/PPE)
<table>
<thead>
<tr>
<th>Health practice overview</th>
<th>Core practices</th>
<th>Next level implementation for better equipped facilities</th>
</tr>
</thead>
</table>
| Reduce congestion at entry/exit point(s) | **Entry ways should be marked** to delineate 6ft  
**Limit and meter** number of customers coming in | **Establish employee position** to monitor customer in-flow at entry  
Stagger shift start times to reduce congestion |
| Screen staff health/exposure (home, entrance) | Conduct common employee screening protocol *(e.g., temperature check, overall health status check, screening questionnaire at home or upon entry)*  
**Send employee home** with fever / potential case  
Advise vulnerable workers and people with underlying health conditions of their **rights with regards to returning to work** | Take employee temperatures and record in centralized log |
| Screen customers | Place **informative signage** at entrance *(e.g., wear face covering, symptom checklist, exposure questionnaire)*  
**Empower employees (e.g., train) to handle potential issues** with a symptomatic customer | **Restrict the bags and outside food and beverage permitted in the facility** to limit potential cross-contamination at games |
| Restrict entry of 3rd party suppliers and delivery | **Communicate protocols to vendors** and minimize entry  
Place informative signage for all to wear a mask *(including delivery personnel)* | Set up times for supplier delivery separate from heavy customer traffic  
and designate separate entries |
2: Facility entry and health check protocols (e.g., pre-work, who is involved, check-in upon arrival) (examples)

Screen staff health/exposure (home, entrance)

Example Questionnaire:
Enter the team member or visitor name: ______________

Have you had close contact with or cared for someone diagnosed with COVID-19 within the last 14 days?

__Yes    __No

Have you experienced any cold or flu-like symptoms in the last 14 days?
Symptoms may include (but are not limited to):
- Cough
- Shortness of breath or chest tightness
- Sore throat
- Nasal congestion or runny nose
- Body aches
- Loss of taste and/or smell
- Diarrhea
- Nausea
- Vomiting
- Fever / Chills / Sweats

__Yes    __No

Are you currently exhibiting a fever of 100.4°F or greater (if available, please confirm with on-site temperature screen)?

__Yes    __No
### 3: PPE requirements (e.g., what do you need before walking in facility) (health practices)

<table>
<thead>
<tr>
<th>Health practice overview</th>
<th>Core practices</th>
<th>Next level implementation for better equipped facilities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Enforce facial covering usage and gloves in customer service and common spaces</td>
<td>Require employees to have face coverings or shields (e.g., face shields mandated for table games where dealer's mouth needs to be seen for those with a hearing impairment) on at all times and access to gloves where usable (e.g., for handling customer credit cards or property, when cleaning, at card tables, etc.)</td>
<td>Ensure ticket(writer(s)/cage cashiers wear protective face shields, masks, and gloves</td>
</tr>
<tr>
<td></td>
<td><strong>Encourage customers to wear face coverings</strong> while on the casino floor</td>
<td></td>
</tr>
<tr>
<td>Ensure PPE (masks, hand sanitizer) is stocked</td>
<td>Incorporate measures into procurement process to ensure necessary supplies (e.g., soap, hand sanitizer) are available (set restrictions to reduce hoarding by locations)</td>
<td>Ensure PPE (e.g., sanitizer, masks) are on order to provide proper lead time for refills</td>
</tr>
<tr>
<td></td>
<td><strong>Ensure employees have access to face coverings</strong> (e.g., surgical or cloth mask that follow public health specifications)</td>
<td>Procure <strong>contactless thermometers</strong>, cloth masks, sanitizer for employees etc.</td>
</tr>
<tr>
<td>Establish standard PPE distribution methods and training</td>
<td>Distribute face coverings at start of shift upon entry or ensure employee has one on</td>
<td><strong>Designate team</strong> to hand out masks and refill hand sanitizer</td>
</tr>
<tr>
<td></td>
<td><strong>Ensure employees understand the use of PPE</strong> (including training of cleaning, storing, doffing and re-donning facial covering, infection control practices, fabric covering limitations, training on glove usage/replacement for subset of employees)</td>
<td><strong>Record and track</strong> who has received their masks (e.g., per week, shift)</td>
</tr>
<tr>
<td></td>
<td><strong>Provide clear guidance on when to wear</strong> certain PPE (e.g., gloves, mask, face shield)</td>
<td></td>
</tr>
</tbody>
</table>

---

**Draft**
3: PPE requirements (e.g., what do you need before walking in facility) (examples)

<table>
<thead>
<tr>
<th>Ensure PPE (face covering, hand sanitizer) is stocked</th>
<th>Enforce PPE (e.g., mask, gloves) usage for employees</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Cloth mask</strong></td>
<td></td>
</tr>
<tr>
<td><img src="image" alt="Cloth mask" /></td>
<td></td>
</tr>
<tr>
<td><strong>Surgical mask</strong></td>
<td></td>
</tr>
<tr>
<td><img src="image" alt="Surgical mask" /></td>
<td></td>
</tr>
</tbody>
</table>

### How to properly wear a face mask

- **Ensure the proper fit of the mask fits comfortably.**
- **Secure the strings behind your ears.**
- **Press the metal strip to fit the shape of the nose.**
- **Cover mouth and nose fully.**
- **Ensure there are no gaps.**

### While Wearing a Face Mask/Covering

Individuals who are not accustomed to wearing a face mask might find the mask uncomfortable or distracting. An important component of a disease-prevention strategy is to limit touching the face. An uncomfortable or poorly fitted mask could encourage touching the face, which is counter to the goal of wearing a face covering. It is critical that wearers do not inadvertently increase their exposure by continually adjusting the mask/covering and touching the face.

<table>
<thead>
<tr>
<th><strong>DO</strong></th>
<th><strong>DO NOT</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>✓ Wash hands before and after putting on mask</td>
<td>× Don’t wear if wet or soiled</td>
</tr>
<tr>
<td>✓ Make sure the mask has no defects (e.g., tears, torn straps, or ear loops)</td>
<td>× Don’t leave mask hanging off one ear, hanging around neck, or place on top of head</td>
</tr>
<tr>
<td>✓ Secure the mask around head and neck or ears</td>
<td>× Don’t place mask on surfaces (e.g., countertops) to store for reuse</td>
</tr>
<tr>
<td>✓ Ensure mask is covering nose, mouth, and chin</td>
<td>× Don’t reuse a single-use mask, dispose after wearing once</td>
</tr>
<tr>
<td>✓ Only touch straps/bands when removing and disposing a mask</td>
<td>× Don’t touch the front or back sides of the mask, as they could be contaminated after use</td>
</tr>
</tbody>
</table>
## 4: Distancing (health practices)

<table>
<thead>
<tr>
<th>Health practice overview</th>
<th>Core practices</th>
<th>Next level implementation for better equipped facilities</th>
</tr>
</thead>
</table>
| Increase distancing for employee interaction (to customers and other employees) | **Reduce the number** of employees and customers **stand 6ft apart** when possible (implement physical barriers in circumstances where customer needs to be closer)  
Leverage PPE usage (e.g., masks or face shields), increased cleaning (i.e., after customer uses machine), and install **protective barriers** (e.g., plastic barriers, rope)  
**Eliminate valet parking** for the time being. **Restrict the occurrence of tournaments** | **Minimize cash transactions** when possible (e.g., contactless payment)  
**Limit the amount of instances a player will touch cards** (to the extent permissible under laws with maintaining game integrity, games can be conducted without patrons touching cards. For games that allow patrons to touch cards, cards should be changed every shift or as frequently as possible)  
**Provide floor beverage service with disposable cups** (and no refills)  
Increase the number of trash cans throughout the facility to insure prompt, easy disposal of used cups |
| Increase distancing for customer interaction | **Require 6ft of separation between customers in common areas by removing seats, closing games, and using visual cues to the extent feasible**  
**Limit the amount of people/groups** that can enter elevators (e.g., one group at a time)  
**Add protocols around food and other services** (e.g., close self service soda/coffee stations, package food)  
**Deactivate some slot machines** as necessary to create social distancing between players.  
**Limit the number of players** allowed at table games (e.g., 3 seats per table, 4 per roulette, 6 per craps table) to ensure 6 ft distance  
**Ensure there is at least 6ft of space between tables/seats** and limit the number of people allowed at the bar (e.g., bars should be marked to indicate 6ft of distance, stools removed, etc.)  
**Limit number of people in the restrooms** by closing stalls and adding queue markings for waiting  
**Mark pathways for foot traffic**, especially to the restroom | **Consider modifications to increase ventilation** (properly space and sanitize smoking areas)  
**Other appropriate distancing measures** in light of circumstances |
| Provide visual reinforcements (e.g., X’s, restrictions in elevators) for distance | **Place X’s on the ground** near elevators and mark floors to encourage one way traffic  
**Place signs in common spaces/elevators** for clear customer communication |  |
4: Distancing (examples)

Example of physical barrier at table

Ensure 6ft of distance

Example slot machine

Example bathrooms with visual reinforcements (e.g., X’s)
<table>
<thead>
<tr>
<th>Health practice overview</th>
<th>Core practices</th>
<th>Next level implementation for better equipped facilities</th>
</tr>
</thead>
</table>
| Conduct frequent cleaning of all high touch areas and post protocols publicly           | **Clean high contact areas based on CDC guidelines** (ticket counter, elevators, bathroom handle, chips/dice/cards, slot machines)  
**Remove unnecessary high-touch items** from game floor  
Communicate and **make cleaning visible** to customers (e.g., increase frequency, post protocols, visible high touch surface cleaning)  
Place sanitizing wipes at slot machines and similar games  
Prop doors open (i.e., to bathrooms, dining areas, etc.) | **Sanitize entire facility multiple times per day** (depends on stage of reopening)                                                                                                                                                                                                                                                                  |
| Establish employee/customer cleaning protocols and emphasize frequent hand washing (for all) | **Train all employees** on cleaning protocols  
**Enforce mandatory handwashing** (as often as possible)  
**Enforce no smoking** rule on casino floor  
**Place signage** throughout the property reminding customers and employees to follow CDC and leverage cleaning supplies (e.g., wash hands, use sanitizer, use sanitizing wipes, stay at home if sick, etc.)  
Set up **hand sanitizing station** at entry way and throughout casino for customers (e.g., check-in counter, elevator, tables, etc.) | **Upgrade bathrooms** to sensor faucets, soap dispensers, and paper towel dispensers to the extent feasible                                                                                                                                                                                                                                      |
| Supply guidance and conduct audit checks for cleaning procedures (including deep clean as needed) | **Fill out cleaning checklist** and share each day with management  
**Train employees** (if responsible for cleaning) to use cleaning materials in accordance with manufacturing guidelines (e.g., mix disinfectant with hot water) | **Conduct virtual or live visits** to check adherence for all locations  
**Ensure easy adoption/adherence** (e.g., purchase different color bucket for **new bleach solution** and create labels, peroxide cleaner)                                                                                                                                                      |
5: Cleaning (e.g., daily cleaning routine) (examples)

Conduct more frequent daily cleaning of all high touch areas and post protocols publicly (Example details)

4 Cleaning Products and Protocols

Our hotels use cleaning products and protocols which meet EPA guidelines and are approved for use and effective against viruses, bacteria and other airborne and bloodborne pathogens. We are working with our vendors, distribution partners and suppliers to ensure an uninterrupted supply of these cleaning supplies and the necessary PPE.

Public Spaces and Communal Areas. The frequency of cleaning and sanitizing has been increased in all public spaces with an emphasis on frequent contact surfaces including, but not limited to, front desk check-in counters, bell desks, elevators and elevator buttons, door handles, public bathrooms, room keys and locks, ATMs, escalators and stair handrails, casino cage counters, gaming machines, gaming tables, gym equipment, dining surfaces and seating areas.

Guest Rooms. Industry leading cleaning and sanitizing protocols are used to clean guest rooms, with particular attention paid to high-touch items including television remote controls, toilet seats and handles, door and furniture handles, water faucet handles, nightstands, telephones, in-room control panels, light switches, temperature control panels, alarm clocks, luggage racks and flooring. The existing Amazon Alexa units allow for touchless control of key features including drapery, air conditioning and lighting.

Laundry. All bed linen and laundry will be changed daily and continue to be washed at a high temperature and in accordance with CDC guidelines. Dirty linen will be bagged in the guest room to eliminate excess contact while being transported to the laundry facility.

Back of the House. The frequency of cleaning and sanitizing will also increase in high traffic back of house areas with an emphasis on the employee dining rooms, employee entrances, uniform control rooms, employee restrooms, loading docks, offices, kitchens, security scanning podiums, Employee Relations service desks and training classrooms.

Shared Equipment. Shared tools and equipment will be sanitized before, during and after each shift or anytime the equipment is transferred to a new employee. This includes phones, radios, computers and other communication devices, payment terminals, kitchen implements, engineering tools, safety buttons, folios, cleaning equipment, keys, time clocks and all other direct contact items used throughout the resort. The use of shared food and beverage equipment in back of the house office pantries (including shared coffee brewers) will be discontinued.

Room Recovery Protocol. In the event of a presumptive case of COVID-19, the guest’s room will be removed from service and quarantined. The guest room will not be returned to service until case has been confirmed or cleared. In the event of a positive case, the room will only be returned to service after undergoing an enhanced sanitization protocol by a licensed third-party expert and approval by the SNHD.

Air Filter and HVAC Cleaning. The frequency of air filter replacement and HVAC system cleaning has been increased and fresh air exchange will be maximized.

Illustrative

Conduct routine checks for cleaning procedures
<table>
<thead>
<tr>
<th>Health practice overview</th>
<th>Core practices</th>
<th>Next level implementation for better equipped facilities</th>
</tr>
</thead>
</table>
| Define protocol for symptomatic employees and customers | Ensure employees with symptoms are sent home immediately and inform employees who have been in close contact (per CDC guidelines)  
Clean potentially exposed areas of the casino  
**Follow doctor’s orders or public health officials guidance** for returning to work if an employee has laboratory confirmed COVID-19  
**If an employee has laboratory confirmed COVID-19** (mark as recordable illness on OSHA 300 log) to the extent required by law. If an employee has symptoms, but not laboratory confirmed COVID-19, they should remain home based on CDC requirements | **Check in periodically on employee symptoms** and work ability |
| Identify and contact exposed people (e.g., provide symptom checking and guidance) | Educate employees on how to manage symptomatic customers upon entry or in the casino  
**Notify employees, to the extent feasibly, if a positive case individual visited the casino** (customer, supplier, employee)  
**Inform co-workers of potential exposure, if there has been close contact (as defined by CDC) when employee is sent home (e.g., if certain areas were used)** | Identify potential employee contacts through contact tracing procedures for **3-7 days prior to onset of employee symptoms** (based on where employee was and whether PPE was worn)  
Communicate procedures with employees |
6: Case monitoring protocols (examples)

Define protocol for symptomatic employees

Provide symptom checking and guidance to exposed employees

Example flow chart for a symptomatic employee (Source: Lear Safe Work Playbook)
7: Facility/space temporary closure (e.g., clear area if someone comes to work sick) (health practices)

<table>
<thead>
<tr>
<th>Health practice overview</th>
<th>Core practices</th>
<th>Next level implementation for better equipped facilities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Enforce appropriate shut down/ pause and cleaning protocol</td>
<td>Require employees to report if they test positive</td>
<td>Set up an isolation room for a symptomatic customer and train an isolation coordinator to ensure proper protocol is carried out</td>
</tr>
<tr>
<td></td>
<td>Close certain areas of the casino immediately for deep cleaning if an employee/customer shows multiple symptoms per CDC guidance¹</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Establish protocol for response to symptoms and/or positive case exposure in the building (e.g., leverage similar protocols to norovirus)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Conduct deep clean based on CDC guidelines</td>
<td></td>
</tr>
<tr>
<td>Communicate protocol to employees and customers</td>
<td>Provide documentation of positive cases for necessary parties (labor union, health services, health insurance). Record confirmed cases in accordance with OSHA guidance²</td>
<td>As appropriate, communicate potential exposure or positive cases, while maintaining employee and customer privacy</td>
</tr>
</tbody>
</table>

## 8: Travel restrictions (health practices)

<table>
<thead>
<tr>
<th>Health practice overview</th>
<th>Core practices</th>
<th>Next level implementation for better equipped facilities</th>
</tr>
</thead>
</table>
| **Restrict business and personal travel** | Reduce risk by **restricting air travel** to only essential travel  
Requiring **14 day quarantine** after return from travel/vacation  
(including but not limited road trips)  
**Encourage employees leverage PPE and hand sanitizer** on public transportation | **Send digital notice** to staff before entering premises on new requirements (includes travel questionnaire) |