Card Rooms COVID-19 Requirements

Summary of January 11 Changes:

• Outdoor and Open-air seating is permitted in Phase 1. No indoor seating.
• Indoor seating is permitted in Phase 2.
• For all phases, capacity is limited to 25%, up to 200 people (excluding staff) as long as proper physical distancing can be achieved.

Card room establishments must adopt a written procedure that is at least as strict as the requirements in this document and that complies with the appropriate safety and health requirements and guidelines established by the Washington State Department of Labor & Industries and the Washington State Department of Health.

Prior to recommencing on-site services, all card room owners are required to develop at each establishment, a comprehensive COVID-19 exposure control, mitigation, and recovery plan which must be adhered to. A site-specific COVID-19 monitor shall be designated at each location to monitor the health of individuals and enforce the COVID-19 job site safety plan. A copy of the plan must be available at all locations and available for inspection by state and local authorities. Failure to meet this requirement may result in sanctions up to, and including, license suspension.

Safety and Health Requirements

All card room owners have a general obligation to maintain a safe and healthy workplace in accordance with state and federal law and safety and health rules for a variety of workplace hazards. Employers must specifically ensure operations follow the main Labor & Industries COVID-19 requirements to protect workers. COVID-19 workplace and safety requirements can be found here.

Additional information is available at Novel Coronavirus Outbreak (COVID-19) Resources and Paid Leave under the Washington Family Care Act and the Families First Coronavirus Response Act.

Card room industry specific requirements

Below is a list of additional requirements that must be met before resuming operations for card rooms activities.

Phase 1

1. Cardroom activities and dining are limited to outdoor or in open-air areas only. See Outdoor and Open-air Seating Guidance here. Guests may still enter indoor facility to access cage, automated teller machine, and restrooms.

Phase 2

2. Indoor card room activities and dining are allowed.

All Phases

3. Indoor, Outdoor or Open-air occupant seating limitations are limited to 25% capacity, up to 200 individuals, (excluding staff), if proper physical distancing can be achieved per Appendix A.

4. Temperature Screening. Points of entry will be limited to allow our security team to conduct temperature checks utilizing thermal cameras or infrared thermometers. Employees or guests confirmed to have a temperature over 100.4°F (38°C) will not be allowed entry to the property and will be directed to contact appropriate medical care.

5. Hand Sanitizer and Hand Washing. Hand sanitizer bottles and/or dispensers will be placed at main entrances and high traffic areas such as the casino floor, restaurant and bar entrances, meeting and
banquet spaces, elevator landings, and restrooms. All guests will be advised by the security team to use hand sanitizer before entering property. Employees are required to use hand sanitizer before and after starting a shift, entering and leaving the gaming floor and when going on break. All employees will be reminded to wash their hands for 20 seconds after any of the following activities: using the restroom, sneezing, blowing their nose, cleaning, sweeping, mopping, smoking, and eating. All soap and hand sanitizer dispensers will be included on a cleaning and restocking schedule to verify adequate supply.

6. All employees will be trained to advise guests to practice physical distancing by standing at least six feet away from other groups of people not traveling with them while standing in lines and moving around the property. Employees will be reminded not to touch their faces and to practice physical distancing by standing at least six feet away from guests and other employees whenever possible.

7. Floor Plan Reconfiguration. Restaurant tables, table games, and other physical layouts, including seating, will be reconfigured to provide appropriate distancing. All properties will comply with local or state mandated occupancy limits.

8. Non-permeable barriers. Encourage placement of non-permeable barriers at locations such as security, cages, restaurants and bars reception and pickup, off-track-betting and lottery workstation, and rewards club. Additional sanitation should also be considered for barriers.

9. Cleaning Products and Protocols. 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.

10. Air Filter and HVAC Cleaning. The frequency of air filter replacement and HVAC system cleaning will be increased, and the amount of air exchange will be maximized to increase external air flow into the building.

11. Follow restaurant, tavern, brewery, winery, distillery requirements for food and beverage service.

12. For liquor licensees who want to add outdoor service to their premises, please go to the Washington State Liquor and Cannabis Board (WSLCB) website, here, to access the Liquor Alterations Request Form. Please submit completed forms to liquoralterations@lcb.wa.gov.

13. Follow the Cleaning, Sanitization and Social Distancing Protocols in Exhibit A

14. Follow the General Employee Cleaning and Sanitization Protocols in Exhibit B

No businesses, including all previously authorized and essential businesses, may operate until they can meet and maintain all the requirements in this document, including providing materials, schedules, and equipment required to comply. Additional considerations may be adopted, as appropriate.

All issues regarding worker safety and health are subject to enforcement action under L&I’s Division of Occupational Safety and Health (DOSH).

- Employers can request COVID-19 prevention advice and help from DOSH.
- Employee workplace safety and health complaints may be submitted to the DOSH Call Center: (1-800-423-7233) or via e-mail to adag235@lni.wa.gov.
- General questions about how to comply with the agreement practices can be submitted to the state’s Business Response Center at https://coronavirus.wa.gov/how-you-can-help/covid-19-business-and-worker-inquiries.
# Exhibit A – Cleaning, Sanitization and Social Distancing Protocols

## Card Rooms

### Table Games

| Cleaning and Sanitizing | a. Supervisors to sanitize table game rails and drink cups after each guest leaves a game  
b. Supervisors to sanitize each chair area after each guest leaves a game, or upon guest’s request  
c. Dealer to sanitize the exterior of the card shoe when entering a game and the interior of the card shoe when the game goes dead  
d. Supervisors to sanitize in table rating units each time they enter a game  
e. Supervisors to sanitize the outside of shufflers every hour; inside to be sanitized once per week  
f. Pit Podiums to be sanitized by Pit Supervisor every four hours including phones, computers, all hardware, all hard surfaces and cabinetry  
g. Security to sanitize or destroy playing cards after use  
h. Dealer to sanitize the money paddle when arriving at the game  
i. Baccarat discard pile and BJ discard holders to be sanitized by supervisor once every four hours  
j. Dealer to sanitize toke boxes before and after dealing a table  
k. Increase frequency of trash pick-up in pits  
l. Chips will be sanitized hourly  
m. All guests will be advised to wear gloves while handling chips and cards if the game dictates  
n. Steam clean layouts every 24 hours  
o. Hard floors will be sanitized every four hours  
p. Employees to sanitize tables and chairs after using the employee break rooms |

### Physical Distancing

| a. Guests must be seated six feet apart unless engineering controls (such as plexiglass partitions) are used.  
b. Do not permit unrelated guests from congregating behind guests  
c. Remove seating in any waiting areas and enforce maximum occupancy limits  
d. Dealers to verbally give breaks instead of “tapping in” and maintain appropriate separation  
e. Table acrylic or plexiglasses partition may be installed between each seat and may increase chair maximum per table |

### Guest Considerations

| a. Guests will be reminded to use hand sanitizer prior to the start of play and reminded of proper mask usage and to maintain 6 feet physical spacing  
b. Guests will be reminded the option to request one pair of gloves per player to play at table |
<table>
<thead>
<tr>
<th>Poker Operations</th>
<th>Cleaning and Sanitizing</th>
<th>Physical Distancing</th>
<th>Guest Considerations</th>
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<td>c. Guests will be reminded the option to provide their contact information in order to receive notification should a COVID-19 case is identified in that property</td>
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<td>d. Cocktail Servers will remain available and serve beverages upon request; Servers will remain available for beverage service in waiting areas; disposable tableware and glassware (paper and plastic) will be used to serve guests</td>
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<td>e. A seat reservation application may be available to guests to virtually stay in queue for the next available seat without physically staying in the property</td>
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<tr>
<td></td>
<td>a. Supervisors to sanitize table game rails after each customer leaves (ongoing)</td>
<td>a. Every other table open and tables to be staggered</td>
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</tbody>
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### Pull Tabs Operations

| Cleaning and Sanitizing | a. Guest facing counters to be sanitized at least once per hour  
b. Employees will be required to wear new gloves when handling pull tabs  
c. Workstations and pull tabs machines to be sanitized at least once every four hours  
d. Single use pens to be provided for guest use or pens to be sanitized after each use  
e. Table counter and chair to be sanitized after use of each guest  
| Physical Distancing | a. Guests to maintain 6 feet of separation while waiting in line with the spacing to be clearly marked on the floor  
b. Every other chair to be removed  
| Guest Considerations | a. Hand sanitizer dispensers to be placed near the bar section  
b. Signage will be placed at bar section to remind guests to sanitize their hands with hand sanitizer dispenser and to remind of proper mask usage and physical distancing  

### Off-Track-Betting (OTB) Operations

| Cleaning and Sanitizing | Off-Track-Betting is pending Emerald Downs operations and sports events:  
a. Supervisors to sanitize chairs after each guest  
b. Ticket writer to sanitize the counter after each guest  
c. Chairs to be sanitized hourly  
d. Supervisor to clean station every hour including phones, computers, hardware, all hard surfaces and counters  
e. Hand sanitizer dispensers to be placed throughout the OTB section  
f. Single use pens to be provided for guest use or pens to be sanitized after each use  
| Physical Distancing | a. Every other betting station open  
b. 6-foot intervals to be marked for ticket window/machine queues  
c. Seats to be reconfigured or removed to allow for appropriate physical distancing  
| Guest Considerations | a. Signage will be placed at the entry to the OTB section to remind guests to sanitize their hands prior to enter the OTB section and to remind of proper mask usage and to maintain 6 feet physical spacing  
b. Servers will remain available and serve beverages upon request; disposable tableware and glassware (paper and plastic) will be used to serve guests  

### Cage and Soft Count

| Cleaning and Sanitizing | a. Guest facing counters to be sanitized at least once per hour  
b. Cashiers will be required to wear gloves when handling chips, bills and checks, and counting should take place on a designated spot where cage surveillance can clearly monitor the counting  
c. Acrylic shield or Plexiglass will be installed at guest facing counters  
d. Workstations to be sanitized at least once every four hours  
e. Cage interior counters and areas to be sanitized by Cage Supervisor every four hours including phones, computers, all hardware, all hard surfaces and cabinetry  

f. All soft count counters and areas will be sanitized by the soft count team prior to and after the count, including racks, count machines, all hardware, all hard surfaces, drop boxes and any other soft count equipment will be sanitized at the end of each count

g. Single use pens to be provided for guest use or pens to be sanitized after each use

h. Chips brought to cages will be sanitized by cashier

| Physical Distancing | a. Guests to maintain 6 feet of separation while waiting in line with the spacing to be clearly marked on the floor  
b. Every other window will be utilized |
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<tbody>
<tr>
<td>Guest Considerations</td>
<td>Hand sanitizer dispensers to be placed at the entrance of queue and next to the guest counters</td>
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</tbody>
</table>

**Security and Surveillance**

| Cleaning and Sanitizing | a. All contact surfaces to be sanitized at the completion of an incident (in addition to standard sanitization protocols)  
b. Shift or Casino managers will assign specific sanitation responsibilities and verify proper protocols are followed  
c. Shift Supervisors to log completed tasks  
d. Shift Manager will notify Security after unscheduled or specialty cleaning protocols are complete (i.e. after a subject is released from a holding room and the room has been sanitized) |
|-------------------------|-------------------------------------------------------------------------------------------------------------------|
| Physical Distancing | a. Standard protocols will be followed unless a specific incident requires more invasive contact  
b. Security guard to assist with enforcing physical distancing protocols in guest queuing areas as required |
| Guest Considerations | Security guard to familiarize themselves with hand sanitizer and mask distribution points for guests and coworkers |

**Public Area**

| Cleaning and Sanitizing | Employees to sanitize the following areas:  
• Guest and garage elevators – every hour  
• Casino entry doors – every hour  
• ATMs – every hour  
• Restrooms – every two hours  
• Escalator and stairway handrails – every hour  
• Employee dining tables and counters – after every use  
• Smoking areas – every four hours  
• Exterior benches – every four hours  
• Trash bins – every four hours |
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<tbody>
<tr>
<td>Physical Distancing</td>
<td>Signage will be placed throughout the public areas to remind guests to sanitize and wash their hands and to remind of proper mask usage, glove usage and physical distancing</td>
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</tbody>
</table>
# Exhibit B – General Employee Cleaning and Sanitization Protocols

| How to Clean | a. Wear disposable gloves to clean and disinfect.  
b. Clean surfaces using soap and water, then use disinfectant.  
c. Cleaning with soap and water reduces number of germs, dirt and impurities on the surface. Disinfecting kills germs on surfaces.  
d. Practice routine cleaning of frequently touched surfaces.  
e. More frequent cleaning and disinfection may be required based on level of use.  
f. Surfaces and objects in public places should be cleaned and disinfected before each use.  
g. High touch surfaces include:  
   - Tables, doorknobs, light switches, countertops, handles, desks, phones, keyboards, toilets, faucets, sinks, etc. |

| How to Disinfect | a. The Company requires the use of EPA registered disinfectants  
b. Follow the instructions on the label to ensure safe and effective use of the product. Many products recommend:  
   - Keeping surface wet for a period of time (see product label).  
   - Precautions such as wearing gloves and making sure you have good ventilation during use of the product.  

   Soft surfaces: For soft surfaces such as carpeted floor, rugs, and drapes  
   a. Clean the surface using soap and water or with cleaners appropriate for use on these surfaces.  
   b. Launder items (if possible) according to the manufacturer’s instructions. Use the warmest appropriate water setting and dry items completely.  
   OR  
   c. Disinfect with an EPA-registered disinfectant.  
   d. Vacuum as usual.  

   Electronics: For electronics, such as tablets, touch screens, keyboards, remote controls, and ATM machines  
   a. We will place a wipeable cover on electronics, where possible.  
   b. For all other electronics, use alcohol-based wipes or sprays containing at least 70% alcohol. Dry surface thoroughly. |
| Cleaning and Sanitizing | a. Employees are instructed to increase their frequency of hand washing with soap or hand sanitizer before and after their shifts, and after they are exposed to high traffic contact areas such as lobbies, restrooms, restaurants and bars, employee dining and break rooms  
b. Employees are required to wear and will be provided appropriate PPE, depending on their roles and responsibilities  
c. Shared tools and equipment will be sanitized before and after each use  
d. Disposable items will be used to temporarily to replace reusable items to minimize physical contact |
| --- | --- |
| Physical Distancing | a. Tables and chairs in employee shared areas such as dining, break rooms and offices will be reduced to provide appropriate distancing  
b. Signage will be posted throughout employee shared areas to remind employees of maintaining proper physical distancing  
c. Employees are advised to go or stay home when showing any known symptoms of COVID-19  
d. Each employee will be scanned for body temperature at beginning and middle of the shift  
e. Employees will be instructed to maintain physical distancing at clock in and out for break |