COVID-19 INDUSTRY GUIDANCE:

Cardrooms, Satellite Wagering Facilities, and Racetracks

July 28, 2020

All guidance should be implemented only with county health officer approval following their review of local epidemiological data including cases per 100,000 population, rate of test positivity, and local preparedness to support a health care surge, vulnerable populations, contact tracing, and testing.

CALIFORNIA ALL

Your Actions Save Lives
covid19.ca.gov

OVERVIEW

On March 19, 2020, the State Public Health Officer and Director of the California Department of Public Health issued an order requiring most Californians to stay at home to disrupt the spread of COVID-19 among the population.

The impact of COVID-19 on the health of Californians is not yet fully known. Reported illness ranges from very mild (some people have no symptoms) to severe illness that may result in death. Certain groups, including people aged 65 or older and those with serious underlying medical conditions, such as heart or lung disease or diabetes, are at higher risk of hospitalization and serious complications. Transmission is most likely when people are in close contact or in a poorly ventilated area with an infected person, even if that person does not have any symptoms or has not yet developed symptoms.

Precise information about the number and rates of COVID-19 by industry or occupational groups, including among critical infrastructure workers, is not available at this time. There have been multiple outbreaks in a range of workplaces, indicating that workers are at risk of acquiring or transmitting COVID-19 infection. Examples of these workplaces include hospitals, long-term care facilities, prisons, food production, warehouses, meat processing plants, and grocery stores.

As stay-at-home orders are modified, it is essential that all possible steps be taken to ensure the safety of workers and the public.

Key prevention practices include:
- ✓ physical distancing to the maximum extent possible,
- ✓ use of face coverings by workers (where respiratory protection is not required) and customers/clients,
- ✓ frequent handwashing and regular cleaning and disinfection,
- ✓ training workers on these and other elements of the COVID-19 prevention plan.

In addition, it will be critical to have in place appropriate processes to identify new cases of illness in workplaces and, when they are identified, to intervene quickly and work with public health authorities to halt the spread of the virus.

PURPOSE

This document provides guidance for cardrooms, satellite wagering facilities, and racetracks with onsite wagering to support a safe, clean environment for workers. In addition, it provides guidance for Third-Party Providers of Proposition Player Services (TPPPS), who operate within the Cardrooms, where applicable.

> **NOTE:** Cardrooms, satellite wagering facilities, and racetracks with onsite wagering that operate or lease hotels, restaurants, bars, spas, salons, fitness centers, swimming pools, nightclubs, lounges, conventions, indoor and outdoor

sporting and entertainment venues, etc., should keep those areas closed until each of those types of establishments are allowed to resume modified or full operation. **Racetracks are currently allowed to operate without spectators.** When allowed to reopen to modified or full operation, cardrooms, satellite wagering facilities, and racetracks with onsite wagering with these establishments should refer to the appropriate industry guidance documents as they become available on the COVID-19 Resilience Roadmap website. All public events or concentrated gatherings, including musical or other performances at these facilities, must be cancelled or postponed.

This guidance is not intended to revoke or repeal any worker rights, either statutory, regulatory or collectively bargained, and is not exhaustive, as it does not include county health orders, nor is it a substitute for any existing safety and health-related regulatory requirements such as those of Cal/OSHA.[1] Stay current on changes to public health guidance and state/local orders, as the COVID-19 situation continues. Cal/OSHA has more comprehensive guidance on their Cal/OSHA General Guidelines on Protecting Workers from COVID-19 webpage. CDC has additional requirements in their guidance for businesses and employers.

*Cardrooms and TPPPS should submit their workplace specific plans to the California Gambling Control Commission at commission@cgcc.ca.gov and the Bureau of Gambling Control at gamblingcontrol@doj.ca.gov prior to resuming operations.

Required Use of Face Coverings

On June 18, CDPH issued Guidance on the Use of Face Coverings, which broadly requires the use of face coverings for both members of the public and workers in all public and workplace settings where there is a high risk of exposure.

People in California must wear face coverings when they are engaged in work, whether at the workplace or performing work off-site, when:

- Interacting in-person with any member of the public;

- Working in any space visited by members of the public, regardless of whether anyone from the public is present at the time;

- Working in any space where food is prepared or packaged for sale or distribution to others;

- Working in or walking through common areas, such as hallways, stairways, elevators, and parking facilities;

- In any room or enclosed area where other people (except for members of the person's own household or residence) are present when unable to physically distance;

- Driving or operating any public transportation or paratransit vehicle, taxi, or private car service or ride-sharing vehicle when passengers are present. When no passengers are present, face coverings are strongly recommended.

Complete details, including all requirements and exemptions to these rules, can be found in the guidance. Face coverings are strongly encouraged in other circumstances, and employers can implement additional face covering requirements in fulfilling their obligation to provide workers with a safe and healthful workplace. Employers must provide face coverings to workers or reimburse workers for the reasonable cost of obtaining them.

Employers should develop an accommodation policy for any worker who meets one of the exemptions from wearing a face covering. If a worker who would otherwise be required to wear a face covering because of frequent contact with others cannot wear one due to a medical condition, they should be provided with a non-restrictive alternative, such as a face shield with a drape attached to the bottom edge, if feasible, and if the medical condition permits it.

Businesses that are open to the public should be cognizant of the exemptions to wearing face coverings in the CDPH Face Covering Guidance and may not exclude any member of the public for not wearing a face covering if that person is complying with the Guidance. Businesses will need to develop policies for handling these exemptions among customers, clients, visitors, and workers.

Workplace Specific Plan

- Establish a written, workplace-specific COVID-19 prevention plan at every facility, perform a comprehensive risk assessment of all work areas and work tasks, and designate a person at each facility to implement the plan.

- Incorporate the CDPH Face Covering Guidance into the Workplace Specific Plan and include a policy for handling exemptions.

- Identify contact information for the local health department where the facility is located, for communicating information about COVID-19 outbreaks among workers.

- Train and communicate with workers and worker representatives on the plan and make the plan available to workers and their representatives.

- Regularly evaluate the facility for compliance with the plan and document and correct deficiencies identified.

- Investigate any COVID-19 illness and determine if any work-related factors could have contributed to risk of infection. Update the plan as needed to prevent further cases.

- Implement the necessary processes and protocols when a workplace has an outbreak, in accordance with CDPH guidelines.

- Identify close contacts (within six feet for 15 minutes or more) of an infected worker and take steps to isolate COVID-19 positive worker(s) and close contacts.

- Adhere to the guidelines below. Failure to do so could result in workplace illnesses that may cause operations to be temporarily closed or limited.

Topics for Worker Training

- Information on COVID-19, how to prevent it from spreading, and which underlying health conditions may make individuals more susceptible to contracting the virus.

- Self-screening at home, including temperature and/or symptom checks using CDC guidelines.

- The importance of not coming to work:

  o If a worker has symptoms of COVID-19 as described by the CDC, such as a fever or chills, cough, shortness of breath or difficulty breathing,

fatigue, muscle or body aches, headache, new loss of taste or smell, sore throat, congestion or runny nose, nausea, vomiting, or diarrhea, OR.

- o If a worker was diagnosed with COVID-19 and has not yet been released from isolation, OR

- o If, within the past 14 days, a worker has had contact with someone who has been diagnosed with COVID-19 and is considered potentially infectious (i.e. still on isolation).

- To return to work after a worker receives a COVID-19 diagnosis only if 10 days have passed since symptoms first appeared, their symptoms have improved, and the worker has had no fevers (without the use of fever reducing medications) for the last 72 hours. A worker without symptoms who was diagnosed with COVID-19 can return to work only if 10 days have passed since the date of the first positive COVID-19 test.

- To seek medical attention if their symptoms become severe, including persistent pain or pressure in the chest, confusion, or bluish lips or face. Updates and further details are available on CDC's webpage.

- The importance of frequent handwashing with soap and water, including scrubbing with soap for 20 seconds (or using hand sanitizer with at least 60% ethanol (preferred) or 70% isopropanol (if the product is inaccessible to unsupervised children) when workers cannot get to a sink or handwashing station, per CDC guidelines).

- The importance of physical distancing, both at work and off work time (see Physical Distancing section below).

- Proper use of face coverings, including:

- o Face coverings do not protect the wearer and are not personal protective equipment (PPE).

- o Face coverings can help protect people near the wearer, but do not replace the need for physical distancing and frequent handwashing.

- o Face coverings must cover the nose and mouth.

- o Workers should wash or sanitize hands before and after using or adjusting face coverings.

- o Avoid touching the eyes, nose, and mouth.

- o Face coverings must not be shared and should be washed and discarded after each shift.

- Information contained in the CDPH Guidance for the Use of Face

Coverings, which mandates the circumstances in which face coverings must be worn and the exemptions, as well as any policies, work rules, and practices the employer has adopted to ensure the use of face coverings. Training should also include the employer's policies on how people who are exempted from wearing a face covering will be handled.

- Ensure independent contractors, temporary, or contract workers at the facility are also properly trained in COVID-19 prevention policies and have necessary supplies and PPE. Discuss these responsibilities ahead of time with organizations supplying temporary and/or contract workers.

- Information on paid leave benefits the worker may be entitled to receive that would make it financially easier to stay at home. See additional information on government programs supporting sick leave and worker's compensation for COVID- 19, including workers' sick leave rights under the Families First Coronavirus Response Act and workers' rights to workers' compensation benefits and presumption of the work-relatedness of COVID-19 pursuant to the Governor's Executive Order N-62-20 while that Order is in effect.

Individual Control Measures and Screening

- Provide temperature and/or symptom screenings for all workers, vendors, contractors, and members of the public when entering the establishment. Make sure the temperature/symptom screener avoids close contact with personnel and guests to the extent possible.

- If requiring workers to self-screen at home, which is an appropriate alternative to providing it at the establishment, ensure that screening was performed prior to the worker leaving the home for their shift and follows CDC guidelines, as described in the Topics for Worker Training section above. This self-screening does not apply to the members of the public who must be screened prior to entry into the facility.

- Encourage workers and members of the public who are sick or exhibiting symptoms of COVID-19 to stay or return home.

- Employers must provide and ensure workers use all required protective equipment, including eye protection and gloves where necessary.

- Employers should consider where disposable glove use may be helpful to supplement frequent handwashing or use of hand sanitizer; examples are for workers who are screening others for symptoms or handling commonly touched items. Workers should wear gloves when handling items contaminated by body fluids.

- Employers must take reasonable measures, including posting signage in

strategic and highly-visible locations, to remind the public that they must use face coverings and practice physical distancing, and should frequently wash their hands with soap for at least 20 seconds, use hand sanitizer, and not touch their face. Employers should take additional steps, for example on their website or promotional materials, to inform the public of these COVID-19 prevention measures prior to planning a visit.

- Remind guests in advance to bring a face covering and make them available to anyone who arrives without one, if possible.

Cleaning and Disinfecting Protocols

- Perform thorough cleaning in high traffic areas such as lobbies, waiting areas, break rooms, and areas of ingress and egress including stairways, escalator handrails, and elevator controls. Frequently disinfect commonly used surfaces including counters, credit card machines, club terminals, touchscreens, armrests, toilets, hand washing facilities, door handles and locks, vehicle keys, and vehicles on display (steering wheels, door handles, seat adjustment controls, radio, etc.).

- Avoid sharing phones, tablets, office equipment, or tools wherever possible. Never share PPE.

- Regularly clean and disinfect equipment and furniture that must be shared between shifts or between users, whichever is more frequent, including but not limited to working surfaces, keys, chips, gaming table rails and chairs, dice and tiles, cards (if not discarded after use), electronic playing book forms, touchscreens, time clocks, cleaning equipment, and stationary and mobile equipment controls.

- Provide time for workers to implement cleaning practices during their shift. Cleaning tasks should be assigned during working hours as part of the worker's job duties.

- Equip terminals, desks, and help counters with proper sanitation products, including hand sanitizer and sanitizing wipes, and provide personal hand sanitizers to all staff directly assisting customers.

- Ensure that sanitary facilities stay operational and stocked at all times and provide additional soap, paper towels, and hand sanitizer when needed.

- Provide resources to promote workers' personal hygiene.

- This will include tissues, no-touch trash cans, hand soap, adequate time for handwashing, alcohol-based hand sanitizers, disinfectants, and disposable towels.

- When choosing disinfecting chemicals, employers should use products

approved for use against COVID-19 on the [Environmental Protection Agency (EPA)-approved](#) list and follow product instructions. Use disinfectants labeled to be effective against emerging viral pathogens, diluted household bleach solutions (5 tablespoons per gallon of water), or alcohol solutions with at least 70% alcohol that are appropriate for the surface. Provide workers training on the chemical hazards, manufacturer's directions, ventilation requirements, and Cal/OSHA requirements for safe use. Workers using cleaners or disinfectants should wear gloves and other protective equipment required by the product instructions. Follow the [asthma-safer cleaning](#) [methods](#) recommended by the California Department of Public Health and ensure proper ventilation.

- To minimize the risk of [Legionnaires' disease](#) and other diseases associated with water, [take steps](#) to ensure that all water systems and features (e.g., drinking fountains, decorative fountains) are safe to use after a prolonged facility shutdown.

- Provide hand sanitizer dispensers (touchless wherever possible) throughout reception areas, lobbies, gaming tables, restaurant entrances, meeting and convention spaces, elevator lobbies, breakrooms, time clock locations, cages (both interior and exterior) showrooms, lobbies, and service areas, for use by customers and workers.

- Adjust or modify table or machine operating hours to provide adequate time for regular thorough cleaning.

- Install and encourage the use of credit cards and hands-free devices, if possible, including motion sensor lights, contactless payment systems, automatic soap and paper towel dispensers, and timecard systems.

- Inspect deliveries and take all necessary and feasible disinfection measures when receiving goods.

- Where possible, do not clean floors by sweeping or other methods that can disperse pathogens into the air. Use a vacuum with a HEPA filter wherever possible.

- Consider installing portable high-efficiency air cleaners, upgrading the building's air filters to the highest efficiency possible, and making other modifications to increase the quantity of outside air and ventilation in offices and other spaces.

Physical Distancing Guidelines

- Implement measures to ensure physical distancing of at least six feet between workers and customers. This can include use of physical partitions or visual cues (e.g., floor markings, colored tape, or signs to indicate where workers and/or customers should stand) and should be used wherever guests form lines or congregate including at check-stands and terminals, restrooms, elevator lobbies, host stands and waiting areas, valet drop off and pickup, etc.

- Take measures where physical distancing cannot be maintained to minimize exposure between cashiers or other workers and customers, such as Plexiglas or other impermeable barriers.

- Consider offering workers who request modified duties options that minimize their contact with customers and other workers (e.g., managing inventory rather than working as a dealer, server, cashier or managing administrative needs through telework).

- Display signage at entrances, cage counters, restrooms, ATM machines, ticket redemption stations, gaming tables, etc. to remind customers of physical distancing, proper use of face coverings and the importance of hand hygiene at every opportunity.

- Adjust meetings to ensure physical distance and use smaller individual meetings at facilities to maintain physical distancing guidelines.

- Decrease the capacity for meeting rooms in order to maintain at least six feet of physical distance between workers.

- Close breakrooms, use barriers, or increase distance between tables/chairs to separate workers and discourage congregating during breaks. Where possible, create outdoor break areas with shade coverings and seating that ensures physical distancing.

- Reconfigure office spaces, gaming tables, cashier's cages, meeting rooms, etc. to ensure workspaces allow for six feet between workers and guests.

- Place additional limitations on the number of workers in enclosed areas like supply rooms, to ensure at least six feet of separation to limit transmission of the virus.

- Stagger worker breaks, in compliance with wage and hour regulations, to maintain physical distancing protocols.

- Close self-service coffee, water, and snack areas, unless guests and workers are capable of dispensing without physical touching.

- Provide a single, clearly designated entrance and separate exit to help maintain physical distancing, wherever possible.

Additional Guidance for Interactions with Members of the Public

- Place hand sanitizing stations in all high traffic areas and other areas where queueing and handling of chips, cards, money, tickets, etc. will occur including but not limited to, machine banks, gaming tables, ATM machines, ticket redemption machines, cashier's cages, betting windows, restrooms, etc. Sanitizing stations should be monitored and maintained as needed.

- When members of the public and workers pass items back and forth for an extended period of time (such as cards or chips), ensure frequent use of hand sanitizer and remind members of the public (with signs and/or verbally) not to touch their eyes, nose, and mouth. Consider providing disposable gloves at each table for use by members of the public. Provide a means of disposal at each location where gloves or other materials are provided.

- Provide time between dealer rotations to allow for thorough hand washing.

- For card games where players touch the cards, upon each dealer rotation, cards in play must be discarded, sanitized, or kept out of rotation for a minimum of 7 days, which is a time period sufficiently long to ensure that no viral contamination remains (based upon the best known information available). For card games where players do not touch the cards, after a period of no more than 8 hours, cards in play must be discarded, disinfected, sanitized, or kept out of rotation for at minimum 7 days. The dealer must use hand sanitizer prior to beginning play at each card table and immediately at the conclusion of the table rotation.

- All chips should be washed and disinfected prior to circulation. Chips should be removed from service and replaced with clean chips upon every dealer rotation.

- Remove tables, chairs, machines, gaming tables, etc. from guest areas so that six feet of physical distance can be maintained for customers and workers wherever possible. If such items cannot be moved, use visual cues to show that they are not available for use or install Plexiglas or other types of impermeable physical barriers to minimize exposure between customers.

- Reduce the number of occupants at gaming tables so that guests have increased physical distance. Install impermeable barriers if feasible. Discontinue non-player game watching that increases the chance of guests breaking physical distance of six feet.

- Discontinue meal service at gaming tables. Staff should take and deliver drink orders to customers to limit the number of people moving around shared spaces. When serving drinks at tables with guests from different households, providing beverages in disposable, lidded containers is recommended.

- For racetracks and satellite wagering facilities with betting windows, closure of betting windows to allow six feet of separation is highly recommended. Consider opening additional locations in alternative venues to increase physical distancing and including physical impermeable barriers, where possible. Provide sanitation stations at the alternative venues.

- Racetrack and satellite wagering facilities seating areas should be reconfigured and sectional closures implemented based on physical distancing requirements including the installation of barriers where necessary.

- Provide resources to promote personal hygiene of members of the public. This will include tissues, no-touch trash cans, hand soap, adequate locations for handwashing, alcohol-based hand sanitizers, disinfectants, and disposable towels.

---

[1] Additional requirements must be considered for vulnerable populations. Employers must comply with all Cal/OSHA standards and be prepared to adhere to its guidance as well as guidance from the Centers for Disease Control and Prevention (CDC) and the California Department of Public Health (CDPH). Additionally, employers must be prepared to alter their operations as those guidelines change.