



# COVID-19 INDUSTRY GUIDANCE: Tribal Casinos

June 5, 2020

[covid19.ca.gov](https://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 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 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 employees (where respiratory protection is not required) and customers/clients,
- ✓ frequent handwashing and regular cleaning and disinfection,
- ✓ training employees 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.

The State has engaged in consultation with California Native American tribes (tribes) to inform the development of these guidelines, which are advisory in nature and are intended to assist tribal casinos seeking to develop reopening and/or operating plans aligned with public health best practices.

## PURPOSE

This document provides guidance for tribal casinos to support a safe, clean environment for workers and members of the public. The State has engaged in government-to-government consultation with California Native American tribal governments to inform the development of these guidelines, which are intended to

assist in formulating tribal casino reopening and/or operating plans that are aligned with public health best practices. These guidelines are advisory in nature, as tribal governments are responsible for ensuring that tribal casinos are constructed, maintained and operated in a manner that adequately protects the public health and safety pursuant to 25 CFR § 522.6(b).

**NOTE:** The State recommends that tribes that operate or lease hotels, restaurants, bars, spas, salons, fitness centers, swimming pools, nightclubs, lounges, retail shopping, conventions, indoor and outdoor sporting and entertainment venues, etc., should keep those areas closed until each of those types of establishments is allowed to resume modified or full operation in neighboring or surrounding counties. When the State allows counties to reopen these industries to modified or full operation, the State encourages tribes with these establishments to refer to the appropriate industry guidance as it becomes available on the [COVID-19 Resilience Roadmap website](#). The State recommends that all public events or concentrated gatherings, including musical or other performances at these facilities, be cancelled or postponed.

This guidance is not intended to revoke or repeal any employee rights, either statutory, regulatory or collectively bargained, and is not exhaustive, as it does not include tribal or county health orders, nor is it a substitute for any existing safety and health-related regulatory guidance such as those of Cal/OSHA.<sup>1</sup> The State recommends that tribes 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.



## 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 designate a person at each facility to implement the plan.
- Identify contact information for the local health department where the facility is located, for communicating information about COVID-19 outbreaks among employees.
- Train and communicate with employees and employee representatives on the plan.
- 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.
- Identify close contacts (within six feet for 15 minutes or more) of an infected employee and take steps to isolate COVID-19 positive employee(s) and close contacts.
- Adhere to the guidelines below. Failure to do so could result in workplace illnesses that may require the temporary limitation or closure of operations.



## Topics for Employee 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 if employees have symptoms of COVID-19 as [described by the CDC](#), such as a frequent cough, fever, difficulty breathing, chills, muscle pain, sore throat, recent loss of taste or smell, or if they or someone they live with have been diagnosed with COVID-19.

- 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 employees 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:
  - Face coverings do not protect the wearer and are not personal protective equipment (PPE).
  - Face coverings can help protect people near the wearer, but do not replace the need for physical distancing and frequent handwashing.
  - Face coverings must cover the nose and mouth.
  - Employees should wash or sanitize hands before and after using or adjusting face coverings.
  - Avoid touching the eyes, nose, and mouth.
  - Face coverings should be washed or discarded after each shift.
- Ensure 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 employer or government-sponsored leave benefits the employee 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 employee's sick leave rights under the [Families First Coronavirus Response Act](#) and employee's rights to workers' compensation benefits, including, where applicable, the presumption of the work-relatedness of COVID-19 pursuant to the Governor's [Executive Order N-62-20](#).



## 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. Screeners, workers, and guests should wear face coverings for the screening.
- If requiring employees 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 Employee 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 should provide and ensure workers and members of the public 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.
- Face coverings are strongly recommended when employees are in the vicinity of others. Workers should have face coverings available and wear them when in shared work areas, such as offices and other areas on the property. Face coverings must not be shared. Employers are generally encouraged to provide face coverings but must provide them when required by employer rules or these guidelines.
- Face coverings are strongly recommended for members of the general public. Facilities should have face coverings available for the general public and instruct them on the proper use of face coverings. When members of the public are entering the facility, workers should provide or make available to them clean face coverings, if they did not bring their own.
- Employers should take reasonable measures, including posting signage in strategic and highly-visible locations, to remind the public that they should use face coverings, practice physical distancing, not to touch

their face, to frequently wash their hands with soap for at least 20 seconds, and to use hand sanitizer. 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 their visit.



## 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 display vehicles (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 in play, gaming table rails and chairs, dice and tiles, slot machines and chairs, 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 employee'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 employees' 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 cleaning 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 employees training on manufacturer's directions and federal and/or 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.

- 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, employee breakrooms, employee time clock locations, cages (both interior and exterior) showrooms, lobbies, and service areas, for use by customers and employees.
- 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.
- 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 barriers. Where barriers are not feasible, employees must wear face coverings and members of the public are highly recommended to wear face coverings.

- Consider offering workers who request modified duties options that minimize their contact with customers and other employees (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.
- Where space is limited, reduce the number of people allowed into venues to accommodate for appropriate physical distancing.
- 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 employees.
- 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, casino cages, meeting rooms, etc., to ensure workspaces allow for six feet between employees 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 employee breaks, in compliance with wage and hour regulations, to maintain physical distancing protocols.
- Close self-service coffee, water, and snack areas, unless guests and employees are capable of dispensing without physical touching.
- Provide a single, clearly designated entrance and separate exit to help maintain physical distancing, wherever possible.
- Ask vendors who are required to enter your locations to have their employees follow the guidance of tribal, local, state, and federal governments regarding face covering use.



## 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 casino chips, cards, money, tickets, etc., will occur including but not limited to, machine banks, gaming tables, ATM machines, ticket redemption machines, casino cages, restrooms, etc. Sanitizing stations should be monitored and maintained as needed.
- When members of the public and employees 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.
- Cards should be changed upon every dealer rotation, disposed of by the outgoing dealer, and replaced with new cards.
- 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 employees 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 and machines so that guests have increased physical distance. Where six feet of distance cannot be created, employees and members of the public must use face coverings. 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.

- 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.

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<sup>1</sup> The State has issued additional requirements for vulnerable populations. The State encourages tribes to comply with all [Cal/OSHA](#) standards and guidance as well as guidance from the [Centers for Disease Control and Prevention \(CDC\)](#) and the [California Department of Public Health \(CDPH\)](#). Additionally, the State encourages tribal employers to be prepared to alter their operations as those guidelines change.

