

Minimum Guidelines for Detroit Commercial Casinos to Reopen

The purpose of this document is to set forth minimum standards for a limited initial re-opening of Michigan commercial casinos. These minimum guidelines 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.

Upon acceptance by the Executive Director, these minimum standards will be incorporated into an Executive order and distributed to each of the three Detroit casinos.

These guidelines are subject to revision by the Board based on recommendations from federal, state and local health authorities related to the spread of COVID-19. This Board will keep the casino licensees apprised of any changes so that the plan can be updated if necessary.

This order only addresses the initial opening. Any changes to information within this order must be approved by the Executive Director via subsequent orders. This communication solely sets forth the minimum standards. Casinos are not precluded from implementing procedures and policies in addition to, or more stringent, than those listed below:

Patron and Employee Entry into Casino

- Each casino will limit points of entry into the casinos.
- The casino shall place signage at each entrance point, cage and throughout the casino reminding patrons of CDC guidelines for social distancing practices, proper washing of hands, wearing masks, and to stay at home if feeling ill or sick.
- All patrons entering a casino shall wear a mask which covers the nose and mouth areas and shall wear the mask in that manner continuously while in the casino unless drinking or eating.
- Patrons who are subject to identification check may be required to briefly lower mask to verify their identity and at other times as required for certain transactions with government issued identification cards. Surveillance must obtain a facial shot of each such patron.
- Casinos will provide masks to their employees, and make available to patrons, if available.
- Casino personnel stationed at entrance points shall receive training regarding appropriate screening to assess whether persons seeking entry are experiencing symptoms of COVID-19 or have recently been exposed to someone diagnosed with COVID-19. They shall be instructed to deny entry that day to anyone who fails the screening. Temperature checks will be required of all individuals prior to entry (casinos must utilize a non-contact thermometer or thermal scanner).

- Individuals with elevated temperatures of 100.4 or higher must be denied access to the casino or sent to a secondary screening area for further review
- Establish a containment area to isolate employees and patrons who fail the initial screening.
- Limit and enforce patron occupancy of 15% based on Fire Department maximums, during casino initial re-opening.
- 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 social distancing guideline.

COVID-19 Preparedness and Response Plan

- Each casino must comply with all prescribed local, state and federal COVID-19 health requirements.
- Employees shall receive COVID-19 training which provides an overview of COVID-19 mitigation protocols, including proper use and disposal of personal protective equipment (PPE), and recognition of COVID-19 symptoms.
- The casino shall identify the casino's Liaison Officer(s) to all casino employees. Any employee who believes he or she may have contracted COVID-19, or who has a COVID-19 related concern of having been exposed shall report such through a process implemented by the casino to the Liaison Officer.
- The Liaison Officer shall report any employee confirmed COVID-19 cases to the Board's Deputy Director of Casino Operations and if required to State and local health authorities and shall follow all CDC and City of Detroit Department of Health guidelines with respect to that person.
- At each employee entrance, before beginning their shift, employees will be required to undergo a temperature check. Casinos will ensure that CDC guidelines regarding employee temperature checks are followed.
- At each employee entrance, the casino shall place markings and or queueing devices to maintain a social distancing of employees reporting to work.
- At each employee entrance, the casino shall post signs setting forth a checklist of COVID-19 symptoms and instructing employees to remain at home if they experience any of the symptoms.
- Signage shall be placed in back-of-house areas reminding employees to follow CDC guidelines for handwashing, using sanitizers and staying home if sick.
- Rolling periodic announcements shall be made through out the casino (if possible) reminding employees and patrons of COVID-19 protocols. Employees shall wear masks and/or face shields and employers are permitted to allow employees to wear gloves while performing their employment duties.

- Break schedules and employee starting/ending times shall be staggered to the extent possible to avoid congregation of individuals in back-of-house areas. Employee meetings shall be accomplished in a manner to promote social distancing.
- Employees with heightened public contact shall be provided frequent opportunities to wash and/or sanitize their hands to reduce the risk of surface transmission. All other employees should be encouraged to wash their hands at frequent set intervals in accordance with CDC guidelines.

Cleaning and Disinfecting

- Prior to reopening, each casino must clean and disinfect all of its hard and soft surfaces in accordance with the guidelines published by the Centers for Disease Control and Prevention (CDC) for Cleaning and Disinfecting Your Facility.
- Each casino must use only proven cleaning products in accordance with EPA guidelines for coronaviruses, bacteria and other infectious pathogens.
- All publicly-available objects touched with high frequency, (ex., ATMs, counters, door handles, elevator panels and buttons, restrooms, dining tables, employee break rooms, sensitive keys, carts, chairs, table rails, trash bins, light switches, phones, kiosks, time clocks, etc.) must be disinfected frequently.
- To the extent available, disinfecting wipes must be made available throughout the casino to enable patrons to disinfect frequently touched surfaces at their discretion.
- Each casino will make hand sanitizer stations available in high traffic areas, including throughout the casino floor and employee break rooms.
- Procedures must be in place for cleaning shared equipment and uniforms.
- The casinos must regularly maintain their HVAC systems and maximize fresh air delivery into the casino.
- Enhanced cleaning protocols shall be used throughout the facility, including back of house areas and MGCB casino offices.

Slot Machines

- Casino will schedule frequent cleaning of slot machines.
- To the extent available, have disinfecting wipe dispensers throughout the gaming floor for use by players when they sit at different slot machines.
- Generously distribute additional automatic hand-sanitizer dispensers across the casino.
- Casinos shall promote social distancing between patrons not traveling together by one or more of the following methods:
 1. Installing a plexiglass barrier between machines
 2. Removing chairs from certain machines

3. Disabling certain slot machines to create distance between operating machines.

Table Games

- Poker rooms shall not be open during initial opening.
- Table games will be limited to three (3) players each, roulette and midi-baccarat games to four (4) players each, and craps games to six (6) players each.
- Dealers must wear masks and/or face shields.
- Develop a plan to address contamination on table surfaces, chips, cards, dice.
- Cards must be replaced before each shift for games where players touch cards.
- Casino shall develop protocols for chips to be cleaned and sanitized daily.
- Dice must be disinfected for each new shooter.
- Casino employees must ensure patrons not participating in the game do not congregate around table games by standing behind patrons who are gaming, and over-the-shoulder play is not permitted.
- Frequently touched areas at a table shall be sanitized often including, but not limited to pit stands, gaming equipment, chairs and table bumpers/arm rests.
- Dealers, Supervisors, or other table game personnel shall sanitize card shoes, dice and other gaming devices and equipment on a frequent basis.
- Hand sanitizer and sanitizing wipes shall be in the pit for use at the table games.
- Casinos may utilize alternative procedures which limit players touching chips and cards and may utilize clear plexiglass barriers between players (may even consider not offering table games where cards are touched by the players).

Queuing Areas

- All queuing areas must have floor markings or other methods of identifying proper distancing.
- Casino employees should remind patrons to adhere to a six (6) foot distance from others.
- Signage shall announce that no more than four (4) individuals are permitted on an elevator at any time, except for a single party of individuals traveling together.
- Utilization of escalators and stairways must be monitored to ensure that individuals traveling in opposite directions are able to maintain social distance to the extent feasible.

Food and Beverage Service

- Casino employees who provide food and drink service on the casino floor will abide by requirements imposed by the state for servers in restaurants, including but not limited to the wearing of masks or other facial coverings at all times. Such employees will also

maintain social distancing from guests to the extent feasible to perform their jobs and all food and drinks will be provided in disposable dishware.

Prohibited Activities

The following are prohibited:

- Poker rooms shall not be open during initial opening.
- Smoking on the casino floor (casinos may provide an alternative area for smoking)
- Concerts, nightclubs, live events and shows
- Promotions and other activities likely to create challenges in meeting social distancing requirements
- Valet service
- Coat check
- Buffets (no self-serve)
- Soda and coffee stations must not be self-serve (only disposable cups should be utilized) unless nanoseptic technology is used to disinfect the self-serve features (e.g. dispensing levers)

Sportsbook

- Sports wagering areas shall be configured in a manner to promote social distancing between patrons.
- Floor markings shall be implemented to assist patrons to maintain 6 feet between patrons in lines and queues.
- Sports Wagering tables, seats, kiosks, ticket counters, ATM's and redemption terminals shall be frequently cleaned with a sanitizing solution. A hand sanitizer and sanitizing wipes shall be available in each sports wagering area.
- Sports wagering ticket writers shall wear a mask and/or face shield and gloves and/or have a plexiglass barrier installed between the ticket writer and patron at the ticket counter.

Hotel and Restaurant Re-opening

Each casino should ensure they are following all CDC guidelines, and Local, and State regulations as to safely re-opening these areas of their operations.

Regulatory Requirements

As casinos are nearing a re-opening status and resumption of gaming operations,

the Board will require confirmation that the regulatory oversight items set forth below have been accomplished prior to re-opening. Each licensee shall work directly with the Enforcement Section to address these requirements.

- A schedule for the replenishment of funds, including cash and chips, in all gaming areas of Licensee, such as: Armored Car Deliveries, Vault, Cage, Ticket Redemption Units (“TRU”), Table Games Trays, etc.
- A list of active employees for the following departments: Security, Surveillance, Finance, IT, Internal Audit, Slots, Table Games and Executive/Administration. The list should be organized by department and include the employee names and job titles. Licensees shall provide an initial list prior to opening and an updated list within 24 hours after opening.
- An updated restricted area access matrix if any changes are made by re-opening.
- Provide a temporary staffing plan.
- An inspection of the surveillance system to ensure continued compliance with all surveillance and camera coverage regulations.
- Verification that all slot machines are communicating to the Central Control Computer System. If any machines are not communicating, they can be disabled until they have been repaired. Provide the Board with notice of any machines not communicating.
- Written confirmation that no slot machines or ticket redemption units have been updated since the closure of the property.
- Conduct an audit of all sensitive keys on the property by the Licensee.
- Conduct an audit of all cards and dice on the property by the Licensee.
- Conduct an audit of all non-value Roulette chips on the property by the Licensee.
- Conduct an audit of all non-value Tournament chips on the property by the Licensee.
- Review secondary chip inventory to ensure no seals have been broken
- Test of all panic buttons.
- Test all emergency exits and fire prevention systems.
- Provide procedures related to i) the expiration of TITO tickets during the closure and ii) refunds for sport wagers which did not occur. These procedures should include at least a 30-day extension from the time of re-opening and a communication plan to notify patrons of the extension.

Occupational licensees will be permitted to submit a renewal application within 7-days of re-opening to prevent license inactivation.

Unless otherwise approved by the Board, each casino must comply with all requirements of the Michigan Gaming Control Board & Revenue Act, as amended. Administrative Rules, and Internal Control Standards upon re-opening.

Conclusion

The COVID-19 pandemic has dealt the casino industry an unexpected and unprecedented blow over the last few months. The Board is committed to assisting each casino Licensee to reopen in a safe and efficient manner consistent with CDC and Michigan guidelines. We fully anticipate that we will work together to rebuild this industry to again be a leading economic engine for Michigan and to restore the first-rate entertainment facilities each of our Licensees have developed.