

STATE OF MICHIGAN
MICHIGAN GAMING CONTROL BOARD

In the Matter of

GREEKTOWN CASINO, L.L.C., DETROIT
ENTERTAINMENT, L.L.C., & MGM
GRAND DETROIT, L.L.C.,

Respondents

**ORDER SETTING MINIMUM GUIDELINES FOR
COMMERCIAL CASINOS TO REOPEN**

The Michigan Gaming Control Board (“Board”) is committed to assisting each casino licensee (“licensee”) to reopening in a safe and efficient manner consistent with the Center for Disease Control (CDC) and State of Michigan guidelines.

This Order provides minimum standards for a limited re-opening in conjunction with the [Governor’s Executive Order 2020-161](#). 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.

This infection-control guidance is subject to revision. Any changes to information within these guidelines must be approved by the Executive Director in subsequent orders. This communication sets forth the minimum standards. Licensees are not precluded from implementing procedures and policies in addition to, or more stringent, than those listed below.

- I. Patron and Employee Entry into Casino
 - A. The licensee must 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 (or signage may say face coverings), and to stay at home if feeling ill or sick.
 - B. All patrons entering a casino must wear a face covering which covers the nose and mouth areas and must wear the face covering in that manner continuously while in the casino unless drinking or eating.

- C. Patrons who are subject to identification check may be required to briefly lower (or lift) face covering 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
- D. Licensees must provide face coverings to their employees, and make available to patrons, if available.
- E. Casino personnel stationed at entrance points must 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 must be instructed to deny entry that day to anyone who fails the screening. Temperature checks are required of all individuals prior to entry (licensees must utilize a non-contact thermometer or thermal scanner).
- F. 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.
- G. Establish a containment area to isolate employees and patrons who are indoors and fail the initial screening.
- H. Limit and enforce patron occupancy of 15% of total occupancy limits established by the State Fire Marshal or local fire marshal.
- I. Efforts will be made to ensure social distancing in all situations, especially in circumstances where the licensee has reached its capacity, efforts must be made to prevent patrons from congregating in violation of the six (6) foot social distancing guideline, except that groups that have arrived together are permitted to remain together while at the casino.

II. COVID-19 Preparedness and Response Plan

- A. Each licensee must comply with all prescribed local, state, and federal COVID-19 health requirements.
- B. Employees must 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.

- C. The licensee must designate a Liaison Officer (or Officers), identify such Officer (or Officers) to all casino employees, and require any employee who believes they may have contracted COVID-19 or been exposed to COVID-19 to report this to an Officer.
- D. A Liaison Officer must 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. The licensee must follow all CDC and City of Detroit Department of Health guidelines with respect to that person.
- E. At each employee entrance, before beginning their shifts, employees must undergo a temperature check. Licensee must ensure that CDC guidelines regarding employee temperature checks are followed.
- F. At each employee entrance, the licensee must place markings and or queueing devices to maintain a social distancing of employees reporting to work.
- G. At each employee entrance, the licensee must post signs setting forth a checklist of COVID- 19 symptoms and instructing employees to remain at home if they experience any of the symptoms.
- H. Signage must be placed in back-of-house areas reminding employees to follow CDC guidelines for handwashing, using sanitizers and staying home if sick.
- I. Rolling periodic announcements must be made through out the casino (if possible) reminding employees and patrons of COVID-19 protocols. Employees must wear face coverings and employers are permitted to allow employees to wear gloves while performing their employment duties.
- J. Break schedules and employee starting/ending times must be staggered to the extent possible to avoid congregation of individuals in back-of-house areas. Employee meetings must be accomplished in a manner to promote social distancing.
- K. Employees with heightened public contact must 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 and/or use hand sanitizer at frequent intervals in accordance with CDC guidelines.

III. Cleaning and Disinfecting

- A. Prior to reopening, each licensee must clean and disinfect all its hard and soft surfaces in accordance with the CDC guidelines.
- B. Each licensee must use only proven cleaning products in accordance with EPA guidelines for coronaviruses, bacteria, and other infectious pathogens.
- C. Each licensee must disinfect all high-touch objects that are accessible to the public, (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.).
- D. Each licensee must provide disinfecting wipes (to the extent they are available) throughout the casino to enable patrons to disinfect frequently touched surfaces.
- E. Each licensee must place hand sanitizer stations in high traffic areas, including throughout the casino floor and employee break rooms.
- F. Procedures must be in place for cleaning shared equipment and uniforms.
- G. The licensee must regularly maintain their HVAC systems and maximize fresh air delivery into the facility.
- H. Enhanced cleaning protocols must be used throughout the facility, including back of house areas and Board casino offices.

IV. Slot Machines

- A. Each licensee must frequently disinfect slot machines, provide wipe dispensaries for slot machines and post signs encouraging patrons to wipe down slot machines before and after use.
- B. Generously distribute additional automatic hand-sanitizer dispensers across the casino.
- C. Each licensee must enable social distancing between slot machines by either:
 - 1. Installing a plexiglass barrier between machines

2. Disabling machines or removing chairs from machines as necessary to maintain six feet of distance between machines in operation.

V. Table Games

- A. Table games are limited to three (3) players each, roulette, and midi-baccarat games to four (4) players each, and craps games to six (6) players each.
- B. Each licensee must require dealers to wear face coverings.
- C. Develop a plan to address contamination on table surfaces, chips, cards, dice.
- D. Cards must be replaced before each shift for games where players touch cards.
- E. Licensee must develop protocols for chips to be cleaned and sanitized daily.
- F. Dice must be disinfected for each new shooter.
- G. Licensee 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.
- H. Frequently touched areas at a table must be sanitized often including, but not limited to pit stands, gaming equipment, chairs, and table bumpers/arm rests.
- I. Dealers, supervisors, or other table game personnel must sanitize card shoes, dice and other gaming devices and equipment on a frequent basis.
- J. Hand sanitizer and sanitizing wipes must be in the pit for use at the table games.
- K. Licensee may utilize alternative procedures which limit players touching chips and cards and may utilize clear plexiglass barriers between players and/or between players and the dealer (may even consider not offering table games where cards are touched by the players).

VI. Queuing Areas

- A. All queuing areas must have floor markings or other methods of identifying proper distancing.
- B. Licensee employees should remind patrons to adhere to a six (6) foot distance from others.
- C. Signage must 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.
- D. 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.

VII. Food and Beverage Service

- A. Each licensee's employees who provide food and drink service on the casino floor must abide by requirements imposed by the State for servers in restaurants, including, but not limited to, the wearing of facial coverings at all times. Such employees must also maintain social distancing from guests to the extent feasible to perform their jobs and all food and drinks must be provided in disposable dishware.

VIII. Prohibited Activities

The following are prohibited:

1. Smoking indoors.
2. Concerts, nightclubs, live events and shows.
3. Promotions and other activities likely to create challenges in meeting social distancing requirements.
4. Valet service.
5. Coat check.
6. Buffets (no self-serve).
7. Soda and coffee stations must not be self-serve.

IX. Sportsbook

- A. Sports wagering areas must be configured in a manner to promote social distancing between patrons.
- B. Floor markings must be implemented to assist patrons to maintain 6 feet between patrons in lines and queues.
- C. Sports wagering tables, seats, kiosks, ticket counters, ATM's and redemption terminals must be frequently cleaned with a sanitizing solution. Hand sanitizer and sanitizing wipes must be available in each sports wagering area.
- D. Sports wagering ticket writers must wear a face covering and/or have a plexiglass barrier installed between the ticket writer and patron at the ticket counter. Gloves will be made available to ticket writers who choose to wear them.

X. Hotel and Restaurant Re-opening

- A. Each licensee must ensure it is following all CDC guidelines, and local, and state regulations as to safely re-opening these areas of their operations.

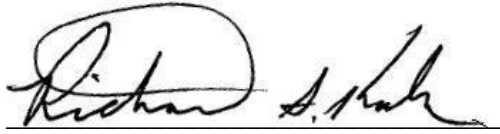
Regulatory Requirements

- 1. Prior to opening each licensee must work directly with the Enforcement Section to address the following requirements.
 - A. 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.
 - B. 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 must provide an initial list prior to opening and an updated list within 24 hours after opening.
 - C. An updated restricted area access matrix if any changes are made by re-opening.

- D. An inspection of the surveillance system to ensure continued compliance with all surveillance and camera coverage regulations.
- E. 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.
- F. Written confirmation that no slot machines or ticket redemption units have been updated since the closure of the property.
- G. Conduct an audit of all sensitive keys on the property by the licensee.
- H. Conduct an audit of all cards and dice on the property by the licensee.
- I. Conduct an audit of all non-value Roulette chips on the property by the licensee.
- J. Conduct an audit of all non-value Tournament chips on the property by the licensee.
- K. Review secondary chip inventory to ensure no seals have been broken.
- L. Test of all panic buttons.
- M. Test all emergency exits and fire prevention systems.
- N. Follow state and federal guidelines to ensure safe drinking water.
- O. Provide written procedures related to:
 - 1) the expiration of TITO tickets during the closure.
 - 2) 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.
- 2. Occupational licensees will be permitted to submit a renewal application within 7-days of re-opening to prevent license inactivation.

Each licensee must comply with all requirements of the Michigan Gaming Control Board & Revenue Act, MCL 432.201 through MCL 432.226, as amended, its Administrative Rules, Internal Control Standards, and Orders.

IT IS SO ORDERED.

A handwritten signature in black ink, appearing to read "Richard S. Kalm", written over a horizontal line.

Richard S. Kalm, Executive Director
Michigan Gaming Control Board

August 4, 2020

Date