



COVID-19 GUIDANCE

COLORADO
Department of Public
Health & Environment

Health and Safety Policies for Resumption of Gaming Operations

The gaming industry is perhaps one of the tightest regulated businesses in the state to oversee both health and welfare of all participants.¹

The primary goal is to work with each casino and the state and county health departments to ensure that the Division's regulatory responsibilities are met upon reopening of the casino industry while simultaneously ensuring Division staff is adhering to all social distancing requirements and safety precautions as we perform our regulatory and police duties. This will be achieved by implementing policies and monitoring to ensure compliance.

The Division of Gaming serves multiple functions in the towns of Black Hawk, Central City and Cripple Creek on a daily basis with offices in Cripple Creek and Central City that carry out our duties and monitor the 24-hour, 7 days-a-week gaming operations. These offices are staffed by Division of Gaming employees who work in the 33 operational casinos and routinely patrol and interact with casino personnel and customers on a daily basis.

Licensees shall operate consistent with all applicable requirements of current State and County Public Health Orders. The division personnel are routinely in all casinos, throughout operating hours, this interaction will support the efforts of the casinos and their employees to remain in compliance by reporting observed concerns immediately to casino management for the purpose of taking appropriate remedial action.

Licensees may be referred directly to local public health officials and/or Five-Star Administrative Committees (for Five-Star Certified businesses) for continued and/or egregious violations. Continued non-compliance or egregious violations may also be referred to the Division of Gaming's Director for possible Administrative action.

GUIDING PRINCIPLES TO KEEP IN MIND

The more an individual interacts with others in person, and the longer that interaction, the higher the risk of COVID-19 spread and widespread COVID-19 outbreaks. The risk of COVID-19 spread increases in a casino or gaming setting as follows:

¹ Colorado Limited Gaming Act 44-30-102 in part states, "therefore be licensed, controlled, and assisted to protect the public health, safety, good order, and the general welfare of the inhabitants of the state to foster the stability and success of limited gaming and to preserve the economy and policies of free competition of the state of Colorado." Gaming Rules 3-30-301—Qualifications for Licensure (3). "[To qualify for licensure an applicant must] Possess premises to be used for gaming that are deemed suitable by the Commission and that satisfy all health and safety requirements." 30-401 Responsibility of licensee: "Responsibility for the employment and maintenance of lawful methods of operation rests with the licensee, and willful or persistent use or toleration of methods of operation considered unlawful by the Commission is prohibited. Each licensee shall fully and timely perform each and every term, condition and duty required by the rules and regulations of the Commission."

| No Risk | Highest Risk (Level Red) | High Risk (Level Orange, Yellow, and Blue) | Caution (PON) |
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| <p>Gaming activities are only available in virtual or online format.</p> | <p>Casinos are open but with limitations to allow social distancing and disinfection of machines between uses.</p> <p>Casinos must follow the indoor event capacity restrictions.</p> <p>Activities are limited to gaming machines and equipment that do not require a dealer and that can be played by one customer at a time and disinfected between uses.</p> <p>Individuals remain spaced at least 6 feet apart (minimum 2 arm's length) while seated or standing.</p> <p>Individuals adhere to appropriate wearing of protective facial coverings at all times.</p> <p>Sharing of gaming materials and equipment is not allowed.</p> <p>Improvements made to ensure proper ventilation within the entire facility.</p> <p>Establishment of policies and procedures for screening of employees and customers.</p> | <p>Casinos are open but with limitations to allow social distancing and disinfection of machines between uses.</p> <p>Casinos must follow the indoor event capacity restrictions.</p> <p>Games that require a dealer and that allow multiple players at the same time are offered, but the number of players is limited.</p> <p>Individuals remain spaced at least 6 feet apart (minimum 2 arm's length) while seated or standing.</p> <p>Individuals adhere to appropriate wearing of protective facial coverings at all times.</p> <p>Casino limits customers' sharing of objects such as dice, card shoes, shufflers, and roulette wheels, Pai Gow tiles, pit podiums, blackjack discard holders, and token boxes. Casino cleans and disinfects these objects between uses as much as possible.</p> <p>Casino limits sharing of items that are difficult to clean and disinfect, such as cards, and holds items for 72 hours before reuse of these items.</p> <p>Improvements made to ensure proper ventilation within the entire facility.</p> <p>Establishment of policies and procedures for screening of employees and customers.</p> | <p>Casino and gaming operations are open but continue to follow the indoor event capacity restrictions.</p> <p>Games that require a dealer and that allow multiple players at the same time are offered.</p> <p>Individuals are not spaced apart while seated or standing.</p> <p>Sharing of gaming materials and equipment is permitted with no restrictions.</p> |

TABLE GAMES REOPENING PLAN FOR CASINOS

In consultation with the Office of the Governor, local health officials, and the industry stakeholders, along with feedback from other state casino regulatory agencies, the Division has created this policy to (1) control admittance to check for health conditions of employees and customers, (2) keep people from different households safely distanced at least six feet apart, (3) clean and disinfect all frequently-touched areas, especially after use by any employee or patron, (4) assure all people wear protective facial coverings, (5) ensure proper ventilation throughout the facility, and (6) monitor compliance and remove any violators. Additionally, casinos should operate in full conjunction with the practices and recommendations within current [CDPHE Workplace Outbreak Guidance](#), as well as current [CDC Business Guidance](#). The details herein are additional specifics for this industry that are to be taken on top of what the general guidance says to do.

All casino operations shall implement and follow all emergency rules promulgated by the Colorado Limited Gaming Control Commission, other relevant State regulatory body rules or guidelines, as well as any other orders passed by state or local health departments.

All Retail Licensees, Master licensees and Sports Betting Operators shall submit a Health and Safety Plan to prevent the spread of COVID-19 and infectious diseases for their area of operation that conforms to this policy. A Master Licensee, acting as its own operator or sharing responsibility for operation of the sports betting operation, may include the Sports Betting Operation within the overall plan for the Retail Licensee. Plans required pursuant to this policy should be regularly and continuously reviewed and executed to ensure the health and safety of licensees' guests and employees.

(1) Control admittance to check for health conditions of employees and customers

Live, masked personnel will control all entrances to monitor customer numbers in the facilities, verify facial coverings are worn by all, unless wearing a facial covering inhibits their health, take temperatures, conduct health screening and ask exposure questions, encourage use of hand sanitizer for employees and guests as they enter and exit the gaming facility. The casinos have security cameras and live surveillance requirements that monitor all areas of a casino. This type of live monitoring can ensure that customers are practicing all current social distancing requirements and alert proper casino personnel to respond and remedy any improper gatherings within the casino.

Each gaming establishment shall limit entry and exit points to better control and monitor occupancy within the gaming establishment. All casinos must have posted at gaming entry points the most currently available [CDC checklist](#) of COVID-19 symptoms and must ask each visitor to read the [list](#), and if there is an affirmative answer to any of the questions about [symptoms](#) or possible exposures, provide additional screening and follow up appropriate to the situation.

All persons seeking to enter the gaming space must have their temperature taken by non-invasive means by a gaming employee. Persons exhibiting a temporal body temperature of 100.4 °F or greater will be denied entry and will not be permitted to enter any casino area.

The Licensee agrees to monitor conditions and Public Health Orders in effect for the county in which it is located, and these restrictions are subject to change to reflect any additional requirements in the Dial Level assigned to it. This may mean increased or decreased restrictions depending on the County's status on the Dial, and the business entity agrees to make changes as necessary to adjust to Dial Level changes.

(2) Keep people safely distanced at least six feet apart

Licensees may operate at occupancy restrictions applicable to the State COVID-19 Dial Level currently assigned to the county in which the licensee is located. Any Licensee approved to participate in a County Five-Star Business Certification Program may operate at capacity restrictions one level less restrictive than the level that the licensee's county is currently assigned.

Any area where patrons routinely queue shall be marked with appropriate signage and/or social distancing markings encouraging social distancing of a minimum of six (6) feet between households. Proper indications should be marked on the floor when applicable, such as in sports betting when placing bets at a kiosk or at a ticket window, to ensure that space is maintained by the public. A physical divider should be installed wherever there is interaction at a counter between a gaming employee and a patron.

Guests and employees will maintain and observe proper social distancing protocols. Every other directly adjacent slot machine will be turned off unless being played by a single player. If adjacent games are enabled for play by a single player, casinos must have procedures in place to ensure that directly adjacent slots machines do not remain in play after the guest has finished play.

Casinos will take all reasonable measures to ensure that every operational slot machine is sanitized before a player sits at the machine, by implementing either a system-driven notification (the machine itself alerts staff the player has stopped playing), or a process by which casino staff monitor machines for departing players and make their best effort to sanitize the machine before a new guest begins play. Machines will also be sanitized on a regular schedule.

Staff will be trained to inform guests that they are prohibited from congregating around any slot machine, and that masks must cover nose and mouth at all times in the casino. Employees must be fully empowered to require guests to disperse and/or re-mask, as needed.

Back of the house and employee social distancing protocols, as provided by state and local health authorities, must be implemented in employee dining rooms, employee entrances, uniform control rooms, employee restrooms, loading docks, offices, kitchens, security scanning podiums, employee relations service desks, and training classrooms.

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(3) Clean and disinfect all frequently-touched areas, especially after use by any employee or patron

Each retail licensee shall have adequate protective equipment for employees and plentiful sanitizer and disinfecting wipes for both employees and customers throughout the facility.

The gaming floor will be cleaned using current continual cleaning protocols. In addition, areas of the floor will be closed on a rotating basis to ensure each area of the gaming floor is deep cleaned at least once in a 24-hour period. For casinos opting not to stay open for 24 hours, deep cleaning may occur overnight.

Staff will clean machines as they see players leave, and on a regular schedule.

All public areas should be cleaned and disinfected on a continual and regular basis, including elevators and elevator buttons, door handles, room keys and locks, ATMs, redemption terminals, rewards club kiosks, escalator and stair handrails, casino cage counters, gaming machines, gaming tables, dining surfaces, restaurant menus, front desk check-in counters, bell desks, etc. Bathrooms will be thoroughly disinfected throughout the day.

Each licensee must ensure and document that its employees are adequately trained on the proper cleaning and disinfecting procedures set forth in the [CDC's guidance](#), and how to prevent the spread of infectious disease, including, without limitation, social distancing, hand washing, and reducing the spread of germs at work.

Facilities should always place a high priority on air quality for patrons and employees, continuously reviewing the operation of their [HVAC systems](#) to identify additional opportunities to enhance their effectiveness. Casinos should take

rigorous measures in accordance with the established guidelines to help mitigate the risk of virus transmission through ventilation systems.

Casinos should maintain business-specific plans for outbreak detection, reporting and response reflecting the practices and recommendations set forth in current [CDPHE Workplace Outbreak Guidance](#).

Guests entering a casino equipped with a Player's Card will be strongly encouraged to use the card while in the casino. Should a COVID case or cases present at that casino, the Player's Card information will be used for contact tracing efforts. Guests that do not have a Player's Card will be strongly encouraged to acquire one and use on premises. If the guest does not have a Player's Card and does not wish to get one, they will be asked to provide contact information including name, address, phone number, date and time of entry, and acknowledgement that they have completed the health screening upon entry. Guests entering a casino not equipped with a player's card system will be asked to provide the same contact information as noted above upon entry.

Casinos will continuously explore all aspects of the guest experience through technology to transition current processes into contactless options for guests.

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(4) Ensure all people wear protective [facial coverings](#)

All persons seeking to enter the gaming space must wear a face covering while in the gaming area, unless wearing a facial covering inhibits their health. Persons not having face covering will be given one by the casino. The face covering, whether personal or property-provided, should sufficiently cover the nose and mouth. Any personal mask brought to the facility by the customer, which covers more than just the nose and mouth, may be subject to inspection and approval by security personnel or Division representatives. Persons refusing to wear facial covering, that do not have a medical reason, will be denied entry.

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(5) Monitor compliance and remove any violators

Casino employees will be situated at all guest points of entry to conduct health screenings, ensure masks are worn and remind guests that masks are required at all times in the casino unless they are seated at a restaurant table and to inform guests that enhanced public health protocols are in place throughout the facility.

Compliance with occupancy restrictions will be monitored by a method appropriate to each property, such as physical counting or electronic methods, subject to the guidance and approval of local public health officials. This may include without limitation, headcounts by security personnel, utilization of a licensee's existing surveillance systems, making use of a licensee's slot accounting system to aid in monitoring the number of patrons on the casino floor, or other electronic methods.

Licensees shall remove from the facility any patron, employee or other persons who refuses to comply with applicable requirements of current State and/or County Public Health Orders or the Casino's business-specific operating plan.

Licensees shall assign employees to focus on ensuring guests do not congregate in groups. All casinos currently have at least one Key licensee on duty that has management level authority to ensure that all employees follow and enforce all health and safety requirements contained in the casinos operating plan.

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(6) Table Games and Card Games

Table games represent unique challenges to safe practices in that they are normally characterized by a crowded table, sharing of chips, and frequent changes in players. For this reason, we are addressing table games separately in terms of distancing, cleaning, and sanitizing as we plan to reopen in the safest environment by managing players and their actions before, during and after play.

Games will have the appropriate number of seats removed to allow adequate social distancing. Where six feet of separation between players is not practicable for the game, and a certain number of players is necessary for the game to be played, the dealer will strictly enforce masking and hand sanitizing requirements.

Card Games and Table Games shall be authorized to open under the following guidelines, and depending on the County status on the COVID-19 Dial that the casino is operating under. Casino table and card games may be open for play in the following order and corresponding COVID-19 dial levels.

Distancing: The number of players shall be based on the type of game to ensure safe distancing between players by limiting the number of seats or betting positions. Blackjack is limited to 3 players per table. House Banked Poker is limited to 3 players. Roulette is limited to 4 players. Craps is limited to 6 players. Player Banked Poker is limited to 6 players per table. To strictly limit the number of patrons at a gaming table, casinos may allow groups within the same household that have arrived together and number less than 8 to play together at a table game. Limiting nonfamilial persons may also be possible to achieve through the use of dividers between gaming positions. Casinos will take reasonable measures to increase distancing between tables to help facilitate safe social distancing between players at separate tables. Where six feet of separation between players at separate tables is not operationally feasible, the dealer, casino supervisors and managers will make extra efforts to strictly enforce masking and hand sanitizing requirements and, where practicable, plexiglass dividers may also be installed between gaming positions and/or between players at separate tables. Casino supervisors and managers must ensure that patrons do not congregate in groups around gaming tables.

Sanitizing: Licensees should ensure dealers have hand sanitizer and mandate continued use for dealers and patrons throughout their shifts. Additional breaks for dealers to use facilities where soap and water is available for handwashing are strongly encouraged. Dealers will require players to use hand sanitizer before beginning play. Decks of paper cards shall be switched out after four (4) hours of usage unless they are not being touched by guests. Decks of plastic cards shall be sanitized at least once in a 24-hour period. For craps, players are required to sanitize their hands before handling the dice. For each new roller, or if the dice have been handled between throws, the dice must be cleaned and sanitized. Plans must ensure regular cleaning and disinfection of, without limitation, table games, rails, chairs, dice, roulette balls, card shoes, shufflers, roulette wheels, pit podiums, blackjack discard holders, and tip boxes when a new player or employee comes into contact with any of the aforementioned gaming equipment. Licensees must regularly replace, clean or disinfect cards and chips.

Division personnel observing table games not being operated in this manner shall immediately report such concerns to casino management for corrective action and, where necessary, casino management will re-educate staff on the proper protocols.

Licensees may be referred directly to local public health officials and/or Five-Star Administrative Committees (for Five-Star Certified businesses) for continued and/or egregious violations, who may order the licensee to temporarily suspend or permanently cease operating table games.

If the licensee fails to cooperate in remedying violations and/or restoring compliance, or if such local public health authorities determine that laws, regulations, or public health orders, the local or state public health authorities may require terminations or modifications of table game operations. Continued non-compliance or egregious violations may also be referred to the Division of Gaming's Director for possible Administrative action.

The Licensee agrees to monitor conditions and Public Health Orders in effect for the county in which it is located, and these restrictions are subject to change to reflect any additional requirements in the Dial Level assigned to it. This may mean increased or decreased restrictions depending on the County's status on the Dial, and the business entity agrees to make changes as necessary to adjust to Dial Level changes.

(7) Reporting Cases and Outbreaks of COVID-19

IF THERE IS A CONFIRMED CASE OF COVID-19 IN THE CASINO

- **The casino must notify and cooperate with their local public health agency on next steps.**
- **Find local public health agency contacts online.**
- **Find outbreak guidance for non-healthcare facilities online.**

REOPENING PLAN FOR THE FIELD OFFICES OF THE DIVISION OF GAMING

The Division will ensure that employees wear protective facial coverings, use sanitizer, and practice social distancing of at least six feet in their day-to-day activities and that there is an adequate level of and type of PPE to perform all Division duties, including that of a police officer and first responder.

A plexiglass divider will be installed in the division's office lobbies, between the licensing and public waiting area.

Non-contact temporal thermometers will be in the Division office prior to staff or public occupancy. Persons exhibiting a temporal body temperature of 100.4 °F or greater or are exhibiting COVID-19 symptoms will be denied entry and will not be permitted to enter the gaming office or any licensed area until that person has been evaluated by a medical professional.