



TO: Interested Stakeholders

FROM: Governor Jay Inslee

DATE: June 11, 2020

SUBJECT: Re-opening Card Rooms and Other Related Businesses – Proclamations 20-25 and 20-25.4

This memorandum serves as the criteria for re-opening card rooms and other related businesses, effective June 11, 2020. After consulting with stakeholders, we have developed the **Phase 2 Card Rooms – COVID-19 Requirements**. These requirements apply as long as Gubernatorial Proclamations 20-25 and 20-25.4, or any extension thereof, is in effect or if adopted as rules by a federal, state or local regulatory agency.

For purposes of this memorandum, “card rooms” are those businesses described in Title 230 WAC and licensed by the Washington Gambling Commission. “Other related businesses” are those businesses that are a) substantially similar to card rooms, b) equally able to meet all **Phase 2 Card Rooms – COVID-19 Requirements**, and c) likewise licensed under Title 230 WAC.

This memorandum stands in the place of any omission from and supersedes any conflicting provision in Proclamation 20-25’s Appendix, “Essential Critical Infrastructure Workers.”

The activities described in this memorandum may resume immediately if:

- a) **The businesses can meet and maintain all requirements, including providing materials, schedules and equipment needed to comply; and**
- b) **The businesses conduct only those activities that are allowed under their county’s phase status.**

General questions about how to comply with safety practices can be submitted to the state’s Business Response Center at <https://coronavirus.wa.gov/how-you-can-help/covid-19-businessand-worker-inquiries>.

All other violations related to Proclamation 20-25 can be submitted at <https://bit.ly/covidcompliance>.

Phase 2 Card Rooms COVID-19 Requirements

Summary of July 24 Changes:

- Indoor card rooms are prohibited until Phase 4.

Card room establishments must adopt a written procedure that is at least as strict as the requirements in this document and that complies with the appropriate Phase 2 safety and health requirements and guidelines established by the Washington State Department of Labor & Industries and the Washington State Department of Health.

Prior to recommencing on-site services, all card room owners are required to develop at each establishment, a comprehensive COVID-19 exposure control, mitigation, and recovery plan which must be adhered to. A site-specific COVID-19 monitor shall be designated at each location to monitor the health of individuals and enforce the COVID-19 job site safety plan. A copy of the plan must be available at all locations and available for inspection by state and local authorities. Failure to meet this requirement may result in sanctions up to, and including, license suspension.

Safety and Health Requirements

All card room owners have a general obligation to maintain a safe and healthy workplace in accordance with state and federal law and safety and health rules for a variety of workplace hazards. In addition, they must comply with the following COVID-19 worksite-specific safety practices as outlined in Governor Jay Inslee's ["Safe Start" Proclamation 20-25.4](#), the Washington State Department of Labor & Industries [General Requirements and Prevention Ideas for Workplaces](#), and the Washington State Department of Health [Workplace and Employer Resources and Recommendations](#). All professional services establishments are required to post signage at the entrance to their business requiring their customers to use cloth face coverings. Employer-owners must specifically ensure operations follow the main L&I COVID-19 requirements to protect professional employee-service providers: Employers must specifically ensure operations follow the main L&I COVID-19 requirements to protect workers, including:

- Educate workers in the language they understand best about coronavirus and how to prevent transmission, and the employer's COVID-19 policies.
- Maintain minimum six-foot separation between all employees (and customers) in all interactions at all times. When strict physical distancing is not feasible for a specific task, other prevention measures are required, such as use of barriers, minimizing staff or customers in narrow or enclosed areas, and staggering breaks and work shift starts.
- Provide (at no cost to employees) and require the wearing of personal protective equipment (PPE), such as gloves, goggles, face shields and face masks as appropriate or required for the work activity being performed. Cloth face coverings must be worn by every employee not working alone on the job site unless their exposure dictates a higher level of protection under L&I safety and health rules and guidance.

- Exceptions to this requirement for cloth face coverings include when working alone in an office, vehicle, or at a job site; if the individual is deaf or hard of hearing, or is communicating with someone who relies on language cues such as facial markers and expression and mouth movements as a part of communication; if the individual has a medical condition or disability that makes wearing a facial covering inappropriate; or when the job has no in-person interaction. ○ Refer to [Washington Coronavirus Hazard Considerations for Employers \(except COVID-19 care in hospitals & clinics\) Face Coverings, Masks, and Respirator Choices](#) for additional details. Cloth face coverings are described in the [Department of Health guidance](#).
- Ensure frequent and adequate hand washing with adequate maintenance of supplies. Use disposable gloves where safe and applicable to prevent virus transmission on tools or other items that are shared.
- Establish a housekeeping schedule that includes frequent cleaning and sanitizing with a particular emphasis on commonly touched surfaces.
- Screen employees for signs/symptoms of COVID-19 at the start of their shift. Make sure sick employees stay home or immediately go home if they feel or appear sick. Cordon off any areas where an employee with probable or confirmed COVID-19 illness worked, touched surfaces, etc.
until the area and equipment is cleaned and sanitized. Follow the [cleaning guidelines](#) set by the Centers for Disease Control to deep clean and sanitize.
- Post a sign at the entrance to the business that requires customers to wear cloth face coverings. Employers are encouraged to require customers to wear cloth face coverings in order to protect their employees.

A site-specific COVID-19 supervisor shall be designated by the employer at each job site to monitor the health of employees and enforce the COVID-19 job site safety plan.

A worker may refuse to perform unsafe work, including hazards created by COVID-19. It is unlawful for an employer to take adverse action against a worker who has engaged in safety-protected activities under the law if the individual's work refusal meets certain requirements. Information is available in these publications: [Safety and Health Discrimination in the Workplace brochure](#) and [Spanish Safety and Health Discrimination brochure](#).

Employees who choose to remove themselves from a work site because they do not believe it is safe to work due to the risk of COVID-19 exposure may have access to certain leave or unemployment benefits. Employers must provide high-risk individuals covered by Proclamation 20-46 with their choice of access to available employer-granted accrued leave or unemployment benefits if an alternative work arrangement is not feasible. Other employees may have access to expanded family and medical leave included in the Families First Coronavirus Response Act, access to unemployment benefits, or access to other paid time off depending on the circumstances.

Additional information is available at [Novel Coronavirus Outbreak \(COVID-19\) Resources](#) and [Paid Leave under the Washington Family Care Act and the Families First Coronavirus Response Act](#).

Card room industry specific requirements

Below is a list of additional requirements that must be met before resuming operations for card rooms activities.

1. Cardroom activities are permitted outdoors only. For outdoor seating, a temporary structure may be used. Outdoor structures (temporary or permanent) should have no more than two walls to provide appropriate ventilation. The limitation on walls applies to both rigid and flexible walls. Guests may still enter indoor facility to access restaurant, cage, automated teller machine, and restrooms.
2. Facility occupant limitations. The restaurant area of the facility must follow occupancy levels allowed under their county's phase status in the Governor's Safe Start Washington Phased Re-opening County by County Plan. The outdoor card room designated area of each facility is limited to 200 individuals, (excluding organization staff), if proper physical distancing can be achieved per Appendix A.
3. Temperature Screening. Points of entry will be limited to allow our security team to conduct temperature checks utilizing thermal cameras or infrared thermometers. Employees or guests confirmed to have a temperature over 100.4°F (38°C) will not be allowed entry to the property and will be directed to contact appropriate medical care.
4. Hand Sanitizer and Hand Washing. Hand sanitizer bottles and/or dispensers will be placed at main entrances and high traffic areas such as the casino floor, restaurant and bar entrances, meeting and banquet spaces, elevator landings, and restrooms. All guests will be advised by the security team to use hand sanitizer before entering property. Employees are required to use hand sanitizer before and after starting a shift, entering and leaving the gaming floor and when going on break. All employees will be reminded to wash their hands for 20 seconds after any of the following activities: using the restroom, sneezing, blowing their nose, cleaning, sweeping, mopping, smoking, and eating. All soap and hand sanitizer dispensers will be included on a cleaning and restocking schedule to verify adequate supply.
5. All employees will be trained to advise guests to practice physical distancing by standing at least six feet away from other groups of people not traveling with them while standing in lines and moving around the property. Employees will be reminded not to touch their faces and to practice physical distancing by standing at least six feet away from guests and other employees whenever possible.
6. Floor Plan Reconfiguration. Restaurant tables, table games, and other physical layouts, including seating, will be reconfigured to provide appropriate distancing. All properties will comply with local or state mandated occupancy limits.
7. Non-permeable barriers. Encourage placement of non-permeable barriers at locations such as security, cages, restaurants and bars reception and pickup, off-track-betting and lottery workstation, and rewards club. Additional sanitation should also be considered for barriers.
8. Cleaning Products and Protocols. Use cleaning products and protocols which meet EPA guidelines and are approved for use and effective against viruses, bacteria, and other airborne and bloodborne pathogens.

9. Air Filter and HVAC Cleaning. The frequency of air filter replacement and HVAC system cleaning will be increased, and the amount of air exchange will be maximized to increase external air flow into the building.
10. Follow restaurant, tavern, brewery, winery, distillery requirements for food and beverage service.
11. For liquor licensees who want to add outdoor service to their premises, please go to the Washington State Liquor and Cannabis Board (WSLCB) website, [here](#), to access the Liquor Alterations Request Form. Please submit completed forms to liquoralterations@lcb.wa.gov.
12. Follow the Cleaning, Sanitization and Social Distancing Protocols in Exhibit A
13. Follow the General Employee Cleaning and Sanitization Protocols in Exhibit B

No businesses, including all previously authorized and essential businesses, may operate until they can meet and maintain all the requirements in this document, including providing materials, schedules, and equipment required to comply. Additional considerations may be adopted, as appropriate.

All issues regarding worker safety and health are subject to enforcement action under L&I's Division of

Occupational Safety and Health (DOSH).

- Employers can request COVID-19 [prevention advice and help](#) from DOSH.
- Employee workplace safety and health complaints may be submitted to the DOSH Call Center: (1- 800423-7233) or via e-mail to adag235@lni.wa.gov.
- General questions about how to comply with the agreement practices can be submitted to the state's Business Response Center at <https://coronavirus.wa.gov/how-you-can-help/covid-19-business-andworker-inquiries>.
- All other violations related to Proclamation 20-25 can be submitted at <https://bit.ly/covid-compliance>.

Exhibit A –Cleaning, Sanitization and Social Distancing Protocols

Card Rooms	
Table Games	
Cleaning and Sanitizing	<ul style="list-style-type: none"> a. Supervisors to sanitize table game rails and drink cups after each guest leaves a game b. Supervisors to sanitize each chair area after each guest leaves a game, or upon guest’s request c. Dealer to sanitize the exterior of the card shoe when entering a game and the interior of the card shoe when the game goes dead d. Supervisors to sanitize in table rating units each time they enter a game e. Supervisors to sanitize the outside of shufflers every hour; inside to be sanitized once per week f. Pit Podiums to be sanitized by Pit Supervisor every four hours including phones, computers, all hardware, all hard surfaces and cabinetry g. Security to sanitize or destroy playing cards after use h. Dealer to sanitize the money paddle when arriving at the game i. Baccarat discard pile and BJ discard holders to be sanitized by supervisor once every four hours j. Dealer to sanitize token boxes before and after dealing a table k. Increase frequency of trash pick-up in pits l. Chips will be sanitized hourly m. All guests will be advised to wear gloves while handling chips and cards if the game dictates n. Steam clean layouts every 24 hours o. Hard floors will be sanitized every four hours p. Employees to sanitize tables and chairs after using the employee break rooms
Physical Distancing	<ul style="list-style-type: none"> a. Guests must be seated six feet apart unless engineering controls (such as plexiglass partitions) are used. b. Do not permit unrelated guests from congregating behind c. guests Remove seating in any waiting areas and enforce maximum occupancy limits

	<ul style="list-style-type: none"> d. Dealers to verbally give breaks instead of “tapping in” and maintain appropriate separation e. Table acrylic or plexiglasses partition may be installed between each seat and may increase chair maximum per table
Guest Considerations	<ul style="list-style-type: none"> a. Guests will be reminded to use hand sanitizer prior to the start of play and reminded of proper mask usage and to maintain 6 feet physical spacing b. Guests will be reminded the option to request one pair of gloves per player to play at table

	<ul style="list-style-type: none"> c. Guests will be reminded the option to provide their contact information in order to receive notification should a COVID-19 case is identified in that property d. Cocktail Servers will remain available and serve beverages upon request; Servers will remain available for food and beverage service in VIP gaming areas; disposable tableware and glassware (paper and plastic) will be used to serve guests e. Single use pens to be provided for guest use or pens to be sanitized after each use
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Poker Operations

Cleaning and Sanitizing	<ul style="list-style-type: none"> a. Supervisors to sanitize table game rails after each customer leaves (ongoing) b. Supervisors to sanitize each chair area after a customer leaves (ongoing) c. Supervisors to sanitize the outside of shufflers every hour; inside to be cleaned once per week d. Supervisors to sanitize podiums at least once per hour including phones, computers, all hardware, all hard surface and cabinetry e. Dealers to sanitize in table rating units each time they enter a game f. Dealers to sanitize token boxes g. Dealers to sanitize cards after each shift h. Dealers to wash hands with soap or hand sanitizer for at least 20 seconds before and after each shift i. Chips will be sanitized hourly j. Hard floors will be sanitized every four hours
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Physical Distancing	<ul style="list-style-type: none"> a. Every other table open and tables to be staggered b. Five chair/guest maximum per table game (corners and middle seat remain) c. Dealers to verbally give breaks instead of “tapping in” and maintain appropriate separation d. Table acrylic or plexiglasses partition may be installed between each seat and may increase chair maximum per table
Guest Considerations	<ul style="list-style-type: none"> a. Guests will be reminded to sanitize their hands prior to the start of play and reminded of proper mask usage and to maintain 6 feet physical spacing b. Guests will be reminded the option to request one pair of gloves per guest to play at table c. Guests will be reminded the option to provide their contact information in order to receive notification should a COVID-19 case is identified in that property d. Cocktail Servers will remain available and serve beverages upon request; Servers will remain available for beverage service in waiting areas; disposable tableware and glassware (paper and plastic) will be used to serve guests e. A seat reservation application may be available to guests to virtually stay in-queue for the next available seat without physically staying in the property

Pull Tabs Operations	
Cleaning and Sanitizing	<ul style="list-style-type: none"> a. Guest facing counters to be sanitized at least once per hour b. Employees will be required to wear new gloves when handling pull tabs c. Workstations and pull tabs machines to be sanitized at least once every four hours d. Single use pens to be provided for guest use or pens to be sanitized after each use e. Table counter and chair to be sanitized after use of each guest
Physical Distancing	<ul style="list-style-type: none"> a. Guests to maintain 6 feet of separation while waiting in line with the spacing to be clearly marked on the floor b. Every other chair to be removed
Guest Considerations	<ul style="list-style-type: none"> a. Hand sanitizer dispensers to be placed near the bar section b. Signage will be placed at bar section to remind guests to sanitize their hands with hand sanitizer dispenser and to remind of proper mask usage and physical distancing

Off-Track-Betting (OTB) Operations	
Operati	
Cleaning and Sanitizing	<p>Off-Track-Betting is pending Emerald Downs operations and sports events:</p> <ul style="list-style-type: none"> a. Supervisors to sanitize chairs after each guest b. Ticket writer to sanitize the counter after each guest c. Chairs to be sanitized hourly d. Supervisor to clean station every hour including phones, computers, hardware, all hard surfaces and counters e. Hand sanitizer dispensers to be placed throughout the OTB section f. Single use pens to be provided for guest use or pens to be sanitized after each use
Physical Distancing	<ul style="list-style-type: none"> a. Every other betting station open b. 6-foot intervals to be marked for ticket window/machine c. queues Seats to be reconfigured or removed to allow for appropriate physical distancing
Guest Considerations	<ul style="list-style-type: none"> a. Signage will be placed at the entry to the OTB section to remind guests to sanitize their hands prior to enter the OTB section and to remind of proper mask usage and to maintain 6 feet physical spacing b. Servers will remain available and serve beverages upon request; disposable tableware and glassware (paper and plastic) will be used to serve guests
Cage and Soft Count	
Cleaning and Sanitizing	<ul style="list-style-type: none"> a. Guest facing counters to be sanitized at least once per hour b. Cashiers will be required to wear gloves when handling chips, bills and checks, and counting should take place on a designated spot where cage surveillance can clearly monitor the counting c. Acrylic shield or Plexiglass will be installed at guest facing counters d. Workstations to be sanitized at least once every four hours e. Cage interior counters and areas to be sanitized by Cage Supervisor every four hours including phones, computers, all hardware, all hard surfaces and cabinetry

	<ul style="list-style-type: none"> f. All soft count counters and areas will be sanitized by the soft count team prior to and after the count, including racks, count machines, all hardware, all hard surfaces, drop boxes and any other soft count equipment will be sanitized at the end of each count g. Single use pens to be provided for guest use or pens to be sanitized after each use h. Chips brought to cages will be sanitized by cashier
Physical Distancing	<ul style="list-style-type: none"> a. Guests to maintain 6 feet of separation while waiting in line with the spacing to be clearly marked on the floor b. Every other window will be utilized
Guest Considerations	Hand sanitizer dispensers to be placed at the entrance of queue and next to the guest counters
Security and Surveillance	
Cleaning and Sanitizing	<ul style="list-style-type: none"> a. All contact surfaces to be sanitized at the completion of an incident (in addition to standard sanitization protocols) b. Shift or Casino managers will assign specific sanitation responsibilities and verify proper protocols are followed c. Shift Supervisors to log completed tasks d. Shift Manager will notify Security after unscheduled or specialty cleaning protocols are complete (i.e. after a subject is released from a holding room and the room has been sanitized)
Physical Distancing	<ul style="list-style-type: none"> a. Standard protocols will be followed unless a specific incident requires more invasive contact b. Security guard to assist with enforcing physical distancing protocols in guest queuing areas as required
Guest Considerations	Security guard to familiarize themselves with hand sanitizer and mask distribution points for guests and coworkers
Public Area	

Cleaning and Sanitizing	<p>Employees to sanitize the following areas:</p> <ul style="list-style-type: none"> • Guest and garage elevators – every hour • Casino entry doors – every hour • ATMs – every hour • Restrooms – every two hours • Escalator and stairway handrails – every hour • Employee dining tables and counters – after every use • Smoking areas – every four hours • Exterior benches – every four hours • Trash bins – every four hours
Physical Distancing	<p>Signage will be placed throughout the public areas to remind guests to sanitize and wash their hands and to remind of proper mask usage, glove usage and physical distancing</p>

Exhibit B – General Employee Cleaning and Sanitization Protocols

How to Clean	<ol style="list-style-type: none"> a. Wear disposable gloves to clean and disinfect. b. Clean surfaces using soap and water, then use disinfectant. c. Cleaning with soap and water reduces number of germs, dirt and impurities on the surface. Disinfecting kills germs on d. surfaces. e. Practice routine cleaning of frequently touched surfaces. More frequent cleaning and disinfection may be required based on level of use. f. Surfaces and objects in public places should be cleaned and disinfected before each use. g. High touch surfaces include: <ul style="list-style-type: none"> • Tables, doorknobs, light switches, countertops, handles, desks, phones, keyboards, toilets, faucets, sinks, etc.
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<p>How to Disinfect</p>	<p>a. The Company requires the use of EPA registered disinfectants</p> <p>b. Follow the instructions on the label to ensure safe and effective use of the product. Many products recommend:</p> <ul style="list-style-type: none"> • Keeping surface wet for a period of time (see product label). • Precautions such as wearing gloves and making sure you have good ventilation during use of the product. <p>Soft surfaces For soft surfaces such as carpeted floor, rugs, and drapes</p> <p>Clean the surface using soap and water or with cleaners</p> <p>a. appropriate for use on these surfaces. Launder items (if possible) according to the manufacturer’s</p> <p>b. instructions. Use the warmest appropriate water setting and dry items completely.</p> <p>OR</p> <p>c. Disinfect with an EPA-registered disinfectant. d. Vacuum as usual.</p> <p>Electronics For electronics, such as tablets, touch screens, keyboards, remote controls, and ATM machines</p> <p>a. We will place a wipeable cover on electronics, where possible.</p>
	<p>b. For all other electronics, use alcohol-based wipes or sprays containing at least 70% alcohol. Dry surface thoroughly.</p>
<p>Cleaning and Sanitizing</p>	<p>Employees are instructed to increase their frequency of hand</p> <p>h. washing with soap or hand sanitizer before and after their shifts, and after they are exposed to high traffic contact areas such as lobbies, restrooms, restaurants and bars, employee dining and break rooms</p> <p>i. Employees are required to wear and will be provided appropriate PPE, depending on their roles and responsibilities</p> <p>j. Shared tools and equipment will be sanitized before and after each use</p>

	<ul style="list-style-type: none"> k. Disposable items will be used to temporarily to replace reusable items to minimize physical contact
Physical Distancing	<ul style="list-style-type: none"> a. Tables and chairs in employee shared areas such as dining, break rooms and offices will be reduced to provide appropriate b. distancing Signage will be posted throughout employee shared areas to remind employees of maintaining proper physical c. distancing Employees are advised to go or stay home when showing any known symptoms of COVID-19 d. Each employee will be scanned for body temperature at beginning and middle of the shift e. Employees will be instructed to maintain physical distancing at clock in and out for break