



ILLINOIS GAMING BOARD

JB Pritzker • Governor Charles Schmadeke • Chairman Marcus D. Fruchter • Administrator

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MEMORANDUM

To: All Terminal Operators
From: Marcus D. Fruchter, Administrator
Date: **June 17, 2020 Updated**
Subject: Protocols for Resumption of Video Gaming Operations

On March 16, 2020, the Illinois Gaming Board (“IGB”) took the unprecedented step of [suspending all statewide video gaming operations](#) in order to prevent the spread of COVID-19 and protect the safety and integrity of Illinois gaming. The IGB’s primary concern during these challenging times is the health and welfare of gaming patrons, employees, IGB staff, and all Illinois residents. The IGB’s response to the COVID-19 pandemic has been, and will continue to be, informed by data, science and guidance from the [Illinois Department of Public Health \(“IDPH”\)](#), [the Centers for Disease Control and Prevention \(“CDC”\)](#), [the Illinois Department of Commerce and Economic Opportunity \(“DCEO”\)](#) and other public health experts.

The IGB is also mindful of the hardship and dire economic disruption this pandemic is causing for the video gaming industry, licensees and their employees, and communities across Illinois. The IGB is committed to the safe, fair, deliberate, consistent, and regulatory compliant resumption of video gaming. The timing and conditions for such a resumption will be based upon public health guidance and metrics, and will proceed within the framework of [Governor Pritzker’s Restore Illinois plan](#).

Toward that end, the purpose of this memo is to outline the protocols Terminal Operators (“TOs”) must follow to obtain approval to safely resume video gaming operations in partnership with Licensed Establishments (“LEs”) throughout the State.

For planning purposes, the IGB presently envisions that resumption of video gaming will not happen before Illinois enters Phase 4 of the Restore Illinois plan – which can happen at the earliest on June 26, 2020. The IGB will announce when VGTs will go live. Please note that this timeline is subject to change based on public health and safety conditions.

Allowable Number of VGTs Per Location – The IGB will allow TOs, in consultation with LEs, to decide how many VGTs are operational in each LE. Below are four options from which TOs and LEs can choose to resume video gaming:

- 1) **Option 1** – The TO erects transparent physical partitions between VGTs to separate customers (*e.g.*, safety glass, acrylic, Plexiglas or solid plastic shields). The partition must be easy to clean and sanitize and at least 1 foot higher than head level for customers seated and

the depth should be measured from the front of the cabinet extended towards the player at a distance of at least 3 feet. The transparent physical partition should extend downward to at least the seat level for a seated patron.

- 2) Option 2 – With IGB approval, a TO can adjust the VGT layout in an LE within the approved gaming area in order to socially distance the VGTs with at least 6 feet of distance from **patron base to patron base**. To proceed under this option in Phase Four of Restore Illinois, the TO must advise the IGB and Scientific Games which VGTs in each LE meet the 6 foot distance requirement.
- 3) Option 3 – If a TO and LE elect to proceed under either Option 1 or Option 2 but cannot make the necessary physical improvements to do so by Phase 4, the TO should tell the IGB and Scientific Games which VGTs in the relevant LE already meet the 6 foot social distancing requirement. The IGB and Scientific Games will then activate only those VGTs pending completion of the remaining steps required to meet the conditions of Option 1 or Option 2, as appropriate.
- 4) Option 4 – A TO and LE can elect to proceed under a plan that combines the elements of Option 1 and Option 2 and allows for the use of partitions and 6 foot spacing between VGTs with the requisite IGB approval to move VGTs and adjust an LE's layout.

Whichever option, or combination of options, is selected for an LE, it must be described by each TO in a matter the IGB and Scientific Games prescribes. As the resumption of video gaming proceeds over subsequent weeks, the IGB will monitor public health conditions and LE and TO compliance with social distancing requirements and other COVID-19 mitigation protocols to make decisions regarding operation of any remaining inactive VGTs as appropriate.

Following the release of the IGB's initial Video Gaming Resumption Protocols, IGB staff received questions whether a TO may reimburse an LE for expenses the LE incurs to purchase its own partitions. The Resumption Protocols establish an efficient process for TOs to submit resumption plans to best ensure a swift reopening that protects the public health. The IGB understands that an LE may want a certain style partition that fits its aesthetic or other design preferences. The Resumption Protocols allow TOs to submit Resumption Plans after working with LEs, and that process is the best avenue to address such aesthetic preferences in this instance. The IGB encourages TOs to work with LEs, where practicable, when purchasing partitions that suit the LE's needs. However, to best ensure that all partitions satisfy public health needs and to avoid potential compliance problems and gaming integrity issues, TOs may not reimburse LEs for the purchase and installation of partitions.

Temporary Performance of Certain Actions by TOs – To safely expedite certain resumption activities and efficiently use available IGB and Scientific Game resources, and until the IGB determines it is no longer warranted, TOs may perform repairs, deliveries, updates, and certain other necessary tasks without participation from Scientific Games technician on site. Such requests must be submitted to the IGB and Scientific Games.

Pandemic Response Liaison – Each TO shall designate and identify to the IGB an employee who will serve as the TO’s Pandemic Response Liaison. The Liaison will be the primary point of contact with the IGB regarding the TO’s Pandemic Resumption Plan. The Liaison will also be responsible for ensuring the TO’s compliance with the Pandemic Resumption Plan, IGB Rules, State law (including executive orders) and applicable IDPH, DCEO guidance and CDC social distancing and COVID-19 requirements. The Liaison shall also assist public health authorities with any needed contact tracing and information sharing.

Pandemic Resumption Plan – Each TO shall submit its proposed Pandemic Resumption Plan to the IGB. The Plan must receive IGB approval before any Terminal Operator’s VGTs may go live for any public-facing video gaming play at any LE of any kind. Submitted plans must be consistent with current IDPH, DCEO, and CDC guidance, Occupational Safety and Health Administration (“OSHA”) recommendations, executive orders, and any other applicable State or local health and safety requirements or guidelines. The IGB will review, evaluate and approve all proposed COVID-19 health and safety response practices in consultation with IDPH.

Additionally, LEs are responsible for complying with all applicable local, state and federal health and safety requirements that govern their operations.

TOs should submit a single plan for items #1 thru #9 to the IGB by email to VGCovidRequest@igb.illinois.gov. If a plan has already been submitted to the IGB please confirm that it meets the guidelines and resubmit the plan to the email address above.

At a minimum, Plans must address in detail the following items:

- 1. Reopening Procedures and Waiver Requests** – Plans shall detail any gaming regulatory reopening procedures, and waiver requests, necessary to reopen and/or implement the Resumption Plan.
- 2. Social Distancing Requirements** – Plans shall detail how current social distancing requirements will be observed and enforced in the following settings:
 - points of ingress and egress to the gaming area
 - VGTs during play
 - all queuing areas
 - gaming area surrounding the VGTs
 - tables and seating areas, including chairs/stools, in the gaming area
 - redemption terminals and kiosks
 - accommodation and protection of employees with compromised immune systems
 - procedures for responding to LEs or patrons who do not comply with social distancing requirements
- 3. Personal Protective Equipment (“PPE”)** – Plans shall detail how current State PPE usage requirements will be observed and enforced, including without limitation:
 - distribution and availability of face masks and other appropriate PPE to patrons and employees [Note: PPE must be provided at no cost to TO employees]

- PPE use requirements for patrons and employees, including exceptions and procedures for identity verification and surveillance purposes
- procedures for responding to patrons and LEs who refuse to comply with PPE requirements
- procedures for proper and safe disposal of used PPE
- requirement that all patrons and employees have some type of face covering
- steps taken to ensure an adequate PPE supply chain including how the PPE is obtained/stored
- specify the number of days the supply must be stored and the minimum PPE storage reserves that will be maintained (in days).

- 4. Cleaning, Disinfecting and Sanitizing** – Plans shall detail procedures and schedules for enhanced regular cleaning, disinfecting and sanitizing and for recurring deep cleaning and disinfecting of the licensed establishment, including the frequency and interval at which the various activities will occur. Cleaning, disinfecting and sanitizing schedules and procedures must be coordinated between the TO and LE and set forth in the Resumption Plan.

LEs must have an established cleaning protocol, PPE, wipes, and hand sanitizer stations in order to resume gaming operations. Therefore, the IGB will consider these items as necessary for the conduct of gaming operations and a TO providing these items to an LE will not be considered an inducement so long as the health and cleaning products provided are directly related to compliance with IDPH and CDC guidelines and an approved Pandemic Resumption Plan.

Note: All gaming areas, including VGTs, must be deep cleaned, sanitized and disinfected prior to reopening.

At a minimum, plans shall provide procedures for the cleaning, disinfecting and sanitizing the following areas:

- a. VGTs
- b. counters and other frequently touched surfaces in the gaming area
- c. chairs/stools in the gaming area
- d. redemption terminals, kiosks, and ATMs

Plans shall outline steps that will be taken to ensure continuing supply of appropriate cleaning, disinfecting and sanitizing products (including hand sanitizer).

Plans shall detail the placement and availability of hand sanitizer and disinfecting wipes in patron and employee areas

- 5. Signage** – Plans shall detail the placement and use of signage on property, including floor markings, to remind patrons and employees of social distancing requirements, proper hand washing, use of sanitizers, use of PPE, and to stay at home if feeling sick. Signage must be displayed at the entrance to the gaming area and inside the gaming area and should instruct

patrons on the policies of the LE (and TO as appropriate) relating to COVID-19 mitigation procedures. TOs must ensure that signage at each location conforms to approved Plan.

Below is a non-exhaustive example of suggested signage content:

- At Entrance to Gaming Area:

“STOP! Access to Gaming Area Restricted!

IF YOU DON'T FEEL WELL OR HAVE A TEMPERATURE, PLEASE LEAVE THE PREMISES.

Please see Attendant for seating.

Facemasks MUST ALWAYS BE worn in the Gaming Area.

Violators will be asked to leave IMMEDIATELY.”

- Inside the Gaming Area:

“Facemasks MUST ALWAYS BE worn in the Gaming Area.

Violators will be asked to leave IMMEDIATELY.”

- On Each VGT Screen & Redemption Terminal Between Uses and Removed By Attendant Prior to Use by Patrons:

“STOP!

Please ASK an Attendant BEFORE proceeding.

Violators will be asked to leave IMMEDIATELY.”

6. **Capacity and Occupancy** – Plans shall detail procedures to ensure facility compliance with [DCEO](#) capacity and occupancy guidelines for bars and restaurants, and that facility occupancy levels remain consistent with observance of IDPH and CDC 6 foot social distancing requirements.
7. **Daily Health Screening** – Plans shall detail how employees and patrons will be screened for fever and other symptoms or illness and for possible exposure to COVID-19. Plans should also address steps that will be taken to comply with the Health Insurance Portability and Accountability Act (“HIPAA”) in connection with such screening. Individuals that do not pass health screening shall not be allowed entry to the gaming area.
8. **Training** – Plans shall provide for employee training and instruction on the following minimum required topics:
 - proper use and disposal of PPE
 - social distancing guidelines and COVID-19 exposure mitigation strategies, including hand washing and to stay home if feeling sick

- recognition of possible COVID-19 symptoms
- procedures for reporting possible COVID-19 exposure
- procedures for responding to patrons and LEs who refuse to comply with social distancing and PPE requirements
- procedures for accommodation and protection of employees with compromised immune systems
- compliance with the Resumption Plan
- proper use and disposal of cleaning, disinfecting and sanitizing products

Note: Employees must be instructed to stay at home if they feel sick, and to notify a supervisor if they observe a patron or co-worker exhibiting COVID-19 symptoms or other illness. Employees shall not be disciplined or otherwise penalized for staying home from work because they were sick, experienced COVID-19 symptoms, were exposed to COVID-19, received a positive COVID-19 diagnosis, or were subject to mandatory quarantine. Nor shall employee bonuses or incentives be tied to attendance in any way that could incentivize employees to come to work while sick.

- 9. Monitoring and Reporting** – Plans shall detail the procedures for ensuring compliance with the TO’s Resumption Plan and for prompt reporting of all violations and deficiencies to the IGB. Plans shall also detail procedures for reporting confirmed patron or employee cases of COVID-19 in conformity with IDPH and local county health authority guidelines.