



**DISPOSITION
MAY 2020 SPECIAL AGENDA**

NEVADA GAMING COMMISSION

IN COMPLIANCE WITH THE GOVERNOR'S EMERGENCY DIRECTIVE #006, DATED MARCH 22, 2020, AND EMERGENCY DIRECTIVE #016, DATED APRIL 29, 2020, THE MAY 7, 2020 SPECIAL MEETING OF THE NEVADA GAMING COMMISSION WAS CONDUCTED BY MEANS OF ELECTRONIC COMMUNICATION.

May 7, 2020

10:00 A.M.

Members Present:

Vacant, Chairman

John T. Moran, Jr., Acting Chairman (Participated via video)

Deborah J. Fuetsch, Member (Participated via video)

Rosa Solis-Rainey, Member (Participated via video)

Steven Cohen, Member (Participated via video)

SPECIAL MEETING AGENDA

10:00 A.M.

- I. **PUBLIC COMMENTS:** This public comment agenda item is provided in accordance with NRS 241.020(2)(c)(3) which requires an agenda provide for a period devoted to comments by the general public, if any, and discussion of those comments. No action may be taken upon a matter raised under this item of the agenda until the matter itself has been specifically included on an agenda as an item upon which action will be taken. Comments by the public may be limited to three minutes as a reasonable time, place and manner restriction, but may not be limited based upon viewpoint.

Refer to Public Comments Attachment 1.

II. **COMMISSION POLICY REVIEW**

1. FOR POSSIBLE ACTION: Consideration of NEVADA GAMING CONTROL BOARD HEALTH AND SAFETY POLICIES FOR THE RESUMPTION OF GAMING OPERATIONS: NONRESTRICTED LICENSEES attached as Exhibit A to this Agenda.

Ratified.

2. FOR POSSIBLE ACTION: Consideration of NEVADA GAMING CONTROL BOARD HEALTH AND SAFETY POLICIES FOR THE RESUMPTION OF GAMING OPERATIONS: RESTRICTED LICENSEES attached as Exhibit B to this Agenda.

Ratified.

- III. **PUBLIC COMMENTS:** This public comment agenda item is provided in accordance with NRS 241.020(2)(c)(3) which requires an agenda provide for a period devoted to comments by the general public, if any, and discussion of those comments. No action may be taken upon a matter raised under this item of the agenda until the matter itself has been specifically included on an agenda as an item upon which action will be taken. Comments by the public may be limited to three minutes as a reasonable time, place and manner restriction, but may not be limited based upon viewpoint.

Due to technical issues during the meeting e-mailed public comments could not be accessed. Following the conclusion of the meeting technical issues were resolved and access was restored. No additional public comments were received.

HEALTH AND SAFETY POLICIES FOR RESUMPTION OF GAMING OPERATIONS

NONRESTRICTED LICENSEES

INTRODUCTION

On March 12, 2020, Governor Steve Sisolak issued the Declaration of Emergency for COVID19 pursuant to the emergency powers conferred upon the Governor of Nevada by chapter 414 of NRS. Pursuant to his Declaration of Emergency, Governor Sisolak issued Emergency Directive 002 on March 18, 2020, which suspended all gaming operations for 30 days. The expiration of Emergency Directive 002 was subsequently extended to April 30, 2020 by Emergency Directive 010. Pursuant to Governor Sisolak's "Nevada United: Roadmap to Recovery" plan, gaming operations will not resume in the beginning stage of recovery, and it will be incumbent upon the Board to ensure the safe reopening of gaming operations in this State.

The purpose of these policies and procedures (Policy) is to notify Nevada's nonrestricted gaming licensees of new operational requirements to mitigate and reduce the risk of exposure to COVID-19 for all employees, patrons, and other guests. This Policy constitutes the minimum requirements that should be followed, and does not preclude a gaming licensee from implementing its own additional requirements.

NRS 463.0129(1)(d) requires that all establishments where gaming is conducted and where gaming devices are operated be controlled and assisted to protect the public health and safety of Nevada's residents, and the Nevada Gaming Control Board (Board) remains resolute in ensuring that gaming operations in this State do not compromise the health and safety of Nevadans.

In consultation with the Office of the Governor, as well as federal, state, and local health officials, the Board has created this Policy to diminish personal contact and increase the level of disinfection in high-use areas, and expects full compliance with this Policy by its nonrestricted licensees.

All final decisions on how gaming establishments reopen in the State of Nevada will be determined by the Board and presented to the Nevada Gaming Commission for ratification.

CREATION AND IMPLEMENTATION OF COVID-19 PREVENTION PLAN

Using this Policy as a guide, each nonrestricted licensee must create and implement a plan to prevent the spread of COVID-19 and infectious diseases ("Plan"). All Plans shall be submitted to Ops@gcb.nv.gov at least seven (7) days before reopening occurs. 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. The Board will provide updates to this Policy as circumstances surrounding this health crisis evolve.

To comply with this Policy, the Board recognizes that certain statutory provisions, including, without limitation, those set forth in NRS 463.1605 and 463.01865, contain certain requirements imposed upon resort hotels licensed by the Commission after July 1, 1992. Pursuant to section 13 of the Governor's Declaration of Emergency Directive 016, the Board is authorized to implement a phased and incremental resumption of gaming operations. Accordingly, nonrestricted licensees subject to the requirements related to resort hotels may choose to delay full compliance with certain of those criteria when executing their Plans required pursuant to this Policy. A nonrestricted licensee that intends to delay full compliance with the resort hotel requirements must include full details thereof in their Plan. The Board will not consider delayed compliance with certain resort hotel criteria a violation of the Gaming Control Act, so long as a licensee's Plan fully complies with this Policy. The Board will revisit this exercise of prosecutorial and regulatory discretion as the Governor's office and the Board continue to track the effects of COVID-19 on the State of Nevada.

PROCEDURES PRIOR TO RESUMING GAMING OPERATIONS

Prior to reopening, each nonrestricted licensee shall 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 licensee must ensure its employees are adequately trained on: (1) the proper cleaning and disinfecting procedures set forth in the CDC's guidance above; and (2) how to prevent the spread of infectious disease, including, without limitation, [social distancing](#), [handwashing](#), and not [spreading germs at work](#). Plans should ensure that any training provided pursuant to this Policy is documented by the licensee.

HEALTH AND SAFETY PROCEDURES ONCE OPERATIONAL

When implementing their plans, licensees should utilize the [Interim Guidance for Businesses and Employers to Plan and Respond to COVID-19](#), published by the CDC. The Board expects licensees to include the following components in its Plans.

Employee and Patron Health Concerns:

Signage should be posted throughout the property reminding employees and patrons of proper hygiene, including, without limitation, proper handwashing, how to cover coughs and sneezes, and to avoid touching their faces.

Employees should be instructed to stay home if they do not feel well, and to contact a supervisor or manager if they notice a co-worker or patron experiencing [symptoms associated with COVID-19](#), such as coughing, shortness of breath, or other flu-like symptoms.

If a licensee is informed or is alerted to a case of COVID-19 at its property, it must communicate the case to and cooperate with its local health authorities. All employees should receive clear instructions on how to properly and efficiently respond to all presumed cases of COVID-19.

Licensees must follow the appropriate steps to conduct additional cleaning and disinfecting protocols of all areas that patrons visited during their stay in accordance with guidelines issued by the licensee's local health authority.

Plans should identify personnel or a department on property to serve as a liaison to assist local health authorities with aggregate data sharing and contact tracing.

Employee Training and Responsibilities:

Proper and frequent handwashing with soap is vital to help combat the spread of COVID-19. All employees should be required and consistently reminded to wash their hands with soap and warm water for 20 seconds, before the start of a shift, at least once during every break period, and several times during their shifts, including, without limitation, when they change gloves or otherwise contaminate their hands.

Appropriate personal protective equipment (PPE) may be required or recommended by federal, state, or local authorities. When required or recommended, licensees should ensure that PPE is available to employees and provide training on how to properly use and dispose of all PPE.

Plans should include a provision outlining training on COVID-19 safety and disinfection protocols for all employees. Additional comprehensive training should be provided for employees who work in areas with frequent patron contact, including, without limitation, housekeeping, food and beverage, internal maintenance, hotel operations, casino operations, and security. Training, whether conducted in person, online, by video, or in writing, should be available in English and Spanish.

Gaming Machines:

Plans must ensure that the floor plan for gaming machines creates proper social distancing between patrons. For example, chairs and stools in front of every other gaming machines could be removed so that patrons do not sit next to each another, or licensees could propose other measures to ensure proper distance between patrons. Additionally, licensees should assign employees to focus on ensuring guests do not congregate in groups.

Plans must address how gaming machines, devices, chairs, and other ancillary equipment will be cleaned and disinfected on a regular basis. Plans should also address the availability of hand sanitizer or disinfectant wipes for patron use on the gaming floor.

Table Games and Card Games:

Plans must limit the number of patrons based on type of game to ensure proper distance between players by limiting the number of seats or betting positions per table. For example, player limit per table should be limited to: three players per blackjack table, six players per craps

table, four players per roulette table, and four players per poker table. Casino supervisors and managers must ensure that patrons do not congregate in groups around gaming tables. Licensees should ensure dealers have hand sanitizer available to offer to patrons throughout their shifts.

Plans should ensure regular cleaning and disinfection of, without limitation, table games, rails, chairs, dice, card shoes, shufflers, roulette wheels, Pai Gow tiles, pit podiums, blackjack discard holders, and token boxes when a new player or employee comes into contact with any of the aforementioned gaming equipment. Plans should also address how licensees will disinfect cards and chips.

Race & Sportsbooks, Keno Lounges, and Bingo Halls:

Plans must ensure that patrons do not congregate in groups and practice proper distancing in these areas. Plans must address how the race & sportsbook, keno lounge, bingo hall, and any other gaming area will be cleaned and disinfected on a regular basis. Plans should also address the availability of hand sanitizer or disinfectant wipes for patron use in these areas.

Occupancy Limits

In order to achieve the social distancing guidelines issued by federal, state, and local health authorities, Plans must limit a property's occupancy to no more than fifty percent (50%) of the occupancy limit assigned to each gaming area of the property by local building and fire codes. Licensees' Plans should detail how compliance with this occupancy limit reduction will be achieved, which may include, without limitation, head counts by security personnel, utilization of a licensee's existing surveillance systems, and making use of a licensee's slot accounting system to aid in monitoring the number of patrons on the casino floor.

Social Distancing Guidelines:

The Board expects all licensees to comply with any and all health and safety guidelines and directives issued by federal, state, and local governing authorities with respect to the operation of hotels, restaurants, retail establishments, and pools.

Guest Queuing. Any area where patrons queue should have appropriate signage requiring social distancing in accordance with federal, state, and local health authority requirements.

Hotel Front Desk, Business Center, and Concierge. Social distancing protocols should be maintained among employees and patrons, consistent with federal, state, and local requirements.

Restaurants and Bars. All restaurants and bars should have reduced seating in accordance with federal, state, and local guidance to allow for appropriate distancing between each table and between patrons.

Meeting and Convention Spaces. Meeting and banquet arrangements should allow for social distancing among attendees during all meetings and events based on federal, state, and local recommendations. Food service for meetings and conventions should be served by personnel and will be managed in accordance with federal, state, and local requirements. Pursuant to CDC guidelines, gatherings of 250 people or more are prohibited until further notice is provided by the Board.

Nightclubs and Dayclubs. Nightclubs and dayclubs within a licensee's property must be closed until further notice.

Retail Spaces. Patron occupancy limits and social distancing protocols should be consistent with federal, state, and local requirements and will be enforced at licensee-owned and leased retail spaces.

Pools. Pool seating should be configured in a manner consistent with federal, state, and local requirements to allow for appropriate distancing.

Back of House. 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.

Cleaning & Disinfection Guidelines Generally:

The Board expects all licensees to comply with any and all health and safety guidelines and directives issued by federal, state, and local governing authorities with respect to the operation of hotels, restaurants, retail establishments, and pools.

Plans should ensure that all public areas will be cleaned and disinfected on a continual and regular basis in accordance with federal, state, and local guidelines for hotel operations. Licensees should increase the frequency of cleaning and disinfecting high-contact surfaces, including, without limitation, front desk check-in counters, bell desks, elevators and elevator buttons, door handles, public bathrooms, room keys and locks, ATMs, redemption terminals, rewards club kiosks, escalator and stair handrails, casino cage counters, gaming machines, gaming tables, gym equipment, dining surfaces, and restaurant menus. Additionally, all restrooms should be cleaned and disinfected on a regular basis.

Cleaning & Disinfection for Hotel Rooms and Operations:

Licensees should ensure that housekeeping staff receives comprehensive training on COVID19 safety and disinfection protocols. Additionally, licensees should provide employees access to required PPE, cleaning products, and sanitizer. Any carts, trolleys, or mobile equipment utilized by or to transport employees should be disinfected on a consistent basis.

Plans should utilize cleaning products that meet Environmental Protection Agency (EPA) guidelines and are approved for use and effective against viruses, bacteria, and other airborne and bloodborne pathogens. A list of disinfectants approved by the EPA for use against COVID19 can be found [here](#). All disinfectants should be used in accordance with their labels to ensure proper application, contact time, and user safety.

Plans should acknowledge the use of cleaning and disinfecting protocols to clean guest rooms approved by the CDC and Occupational Safety and Health Administration (OSHA). Licensees should ensure that increased attention is paid to high-touch items, including, without limitation, remote controls, toilets and handles, door and furniture handles, water faucet handles, nightstands, telephones, in-room control panels, light switches, temperature control panels, and flooring. Linens should be washed at a high temperature and with appropriate cleaning products in order to eliminate viral and bacterial pathogens.

Back of House. The frequency of cleaning and disinfecting will also increase in high traffic back of house areas with an emphasis on the employee dining rooms, employee entrances, uniform control rooms, employee restrooms, loading docks, offices, kitchens, security scanning podiums, employee relations service desks, and training classrooms.

Plans should ensure that any tools and equipment shared by employees will be disinfected before, during, and after each shift, or anytime the equipment is transferred to a different employee. This includes, without limitation, phones, radios, computers, other communication devices, payment terminals, engineering tools, safety buttons, folios, cleaning equipment, keys, time clocks, and all other direct contact items used by employees throughout the licensee's property.

COVID-19 Room Recovery Protocol. Plans must include a cleaning procedure in the event of notice or knowledge of a hotel guest with a confirmed case of COVID-19. The hotel guest's room must be removed from service and undergo an enhanced cleaning protocol as determined by local health authorities. The licensee is prohibited from returning that hotel room to service until the licensee has complied with the requirements set forth in NRS 447.100, as well as with any additional guidance from local health authorities.

Cleaning & Sanitation for Restaurants, Bars, and Lounges:

Plans should ensure that all dining tables, bar tops, stools, and chairs are disinfected after each use. All host podiums, service stations, service carts, beverage stations, counters, handrails, and trays should be disinfected on a regular basis. All point of sale terminals should be disinfected between uses and after each shift.

Employees who handle food should comply with state and local health district guidelines.

CONCLUSION

This Policy is subject to revision by the Board based on recommendations from federal, state, and local health authorities related to the spread of COVID-19. The Board will keep nonrestricted licensees apprised of any changes so that Plans can be updated.

HEALTH AND SAFETY POLICIES FOR RESUMPTION OF GAMING OPERATIONS

RESTRICTED LICENSEES

INTRODUCTION

On March 12, 2020, Governor Steve Sisolak issued the Declaration of Emergency for COVID-19 pursuant to the emergency powers conferred upon the Governor of Nevada by chapter 414 of NRS. Pursuant to his Declaration of Emergency, Governor Sisolak issued Emergency Directive 002 on March 18, 2020, which suspended all gaming operations for 30 days. The expiration of Emergency Directive 002 was subsequently extended to April 30, 2020 by Emergency Directive 010. Pursuant to Governor Sisolak's "Nevada United: Roadmap to Recovery" plan, gaming operations will not resume in the beginning stage of recovery, and it will be incumbent upon the Board to ensure the safe reopening of gaming operations in this State.

The purpose of these policies and procedures (Policy) is to notify Nevada's restricted gaming licensees of new operational requirements to mitigate and reduce the risk of exposure to COVID-19 for all employees, patrons, and other guests.

NRS 463.0129(1)(d) requires that all establishments where gaming is conducted and where gaming devices are operated be controlled and assisted to protect the public health and safety of Nevada's residents, and the Nevada Gaming Control Board (Board) remains resolute in ensuring that gaming operations in this State do not compromise the health and safety of Nevadans.

In consultation with the Office of the Governor, as well as federal, state, and local health officials, the Board has created this Policy to diminish personal contact and increase the level of disinfection in high-use areas, and expects full compliance with this Policy by its restricted licensees.

All final decisions on how gaming establishments reopen in the State of Nevada will be determined by the Board and presented to the Nevada Gaming Commission for ratification.

CREATION AND IMPLEMENTATION OF INFECTIOUS DISEASE PREVENTION PLAN

Each restricted licensee must acknowledge that it will comply with this Policy. Such acknowledgement must be submitted to Ops@gcb.nv.gov at least seven (7) days before reopening. This Policy should not be implemented on a temporary basis; rather, it should be regularly and continuously reviewed and executed to ensure the health and safety of licensees' guests and employees. The Board will provide updates to this Policy as circumstances surrounding this health crisis evolve.

To comply with this Policy, the Board recognizes that certain statutory provisions, including, without limitation, those set forth in subsection 2 of NRS 463.161, contain certain requirements

imposed upon restricted licensees in certain counties. Pursuant to section 13 of the Governor's Declaration of Emergency Directive 016, the Board is authorized to implement a phased and incremental resumption of gaming operations. Accordingly, restricted licensees subject to the requirements in subsection 2 of NRS 463.161 may choose to delay full compliance with certain of those criteria when implementing the new operational requirements set forth in this Policy. A restricted licensee that intends to delay full compliance with these statutory requirements must provide full details thereof to the Enforcement Division at Ops@gcb.nv.gov. The Board will not consider delayed compliance with such statutory requirements a violation of the Gaming Control Act, so long as a restricted licensee fully complies with this Policy. The Board will revisit this exercise of prosecutorial and regulatory discretion as the Governor's office and the Board continue to track the effects of COVID-19 on the State of Nevada.

PROCEDURES PRIOR TO RESUMING GAMING OPERATIONS

Prior to reopening, each restricted licensee shall 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 licensee must ensure its employees are adequately trained on: (1) the proper cleaning and disinfecting procedures set forth in the CDC's guidance above; and (2) how to prevent the spread of infectious disease, including, without limitation, [social distancing](#), [handwashing](#), and not [spreading germs at work](#). Licensees should ensure that any training provided pursuant to this Policy is documented.

HEALTH AND SAFETY PROCEDURES ONCE OPERATIONAL

When implementing this Policy, licensees should utilize the [Interim Guidance for Businesses and Employers to Plan and Respond to COVID-19](#), published by the CDC. The Board expects licensees to implement the following actions upon reopening.

Employee and Patron Health Concerns:

Signage should be posted throughout the property reminding employees and patrons of proper hygiene, including, without limitation, proper handwashing, how to cover coughs and sneezes, and to avoid touching their faces.

Employees should be instructed to stay home if they do not feel well, and to contact a supervisor or manager if they notice a co-worker or patron experiencing [symptoms associated with COVID-19](#), such as coughing, shortness of breath, or other flu-like symptoms.

If a licensee is informed or is alerted to a case of COVID-19 at its property, it must communicate the case to and cooperate with its local health authorities. All employees should receive clear

instructions on how to properly and efficiently respond to all presumed cases of COVID-19. Licensees should follow the appropriate steps to conduct additional cleaning and disinfecting protocols of all areas that patrons visited during their stay in accordance with guidelines issued by the licensee's local health authority.

Employee Training and Responsibilities:

Proper and frequent handwashing with soap is vital to help combat the spread of COVID-19. All employees should be required and consistently reminded to wash their hands with soap and warm water for 20 seconds, before the start of a shift, at least once during every break period, and several times during their shifts, including, without limitation, every time they change their gloves or otherwise contaminate their hands.

Appropriate personal protective equipment (PPE) may be required or recommended by federal, state, or local authorities. When required or recommended, licensees should ensure that PPE is available to employees and provide training on how to properly use and dispose of all PPE.

Gaming Machines

Licensees must ensure that the floor plan for gaming machines creates proper social distancing between patrons. To achieve these requirements, licensees may remove every other chair or stool in front of a gaming machine or cover a machine's bill and ticket validator so that patrons do not use that machine. Additionally, licensees should assign employees to focus on ensuring guests do not congregate in groups.

Licensees must clean and disinfect gaming machines, devices, chairs, and other ancillary equipment on a regular basis. Licensees should make hand sanitizer or disinfectant wipes available for patron use.

Occupancy Limits

In order to achieve the social distancing guidelines issued by federal, state, and local health authorities, licensees must limit a property's occupancy to no more than fifty percent (50%) of the occupancy limit assigned to the property by local building and fire codes.

Cleaning & Disinfection Guidelines Generally:

Licensees must provide for the regular disinfection of high-use and high-touch areas, including, without limitation, bar tops, bar top gaming devices, bar stools, chairs, dining areas, customerfacing countertops, ATMs, payment terminals, marketing kiosks, and jukeboxes. Both employee- and customer-used point of sale terminals must be cleaned and disinfected continuously, preferably after each customer use. All table tents and other promotional materials must be removed from dining and bar areas.

Licensees should utilize cleaning products that meet Environmental Protection Agency (EPA) guidelines and are approved for use and effective against viruses, bacteria, and other airborne and bloodborne pathogens. A list of disinfectants approved by the EPA for use against COVID19 can be found [here](#). All disinfectants should be used in accordance with their labels to ensure proper application, contact time, and user safety.

During dining service, beverage stations, service stations and carts, counters, handrails, and serving trays must be cleaned and disinfected regularly during hours of operation. Menus, menu covers, check presenters, pens, and all other items regularly reused by guests and employees must be disinfected on a regular basis and again at the end of each working shift.

Guests should be served with single-use, disposable glassware, plates, napkins, and utensils. Condiments may only be provided in single-use packets.

Tavern, supermarket, and convenience store managers must ensure that disinfection protocols are followed for all interior and exterior door handles, kitchen or other back of house work stations, and restrooms.

Health and hygiene [reminders](#) and [instructions](#) must be posted publicly, in the view of patrons.

Social Distancing Protocols: Taverns

A tavern may not exceed more than 50% of its total capacity at any time. Dining seating capacity is also limited to 50% of a dining area's total capacity.

Whether there is a bar top gaming machine in that area, every other bar stool must be removed to effectuate proper social distancing among patrons.

Social Distancing Protocols: Supermarkets and Convenience Stores

Gaming attendants must ensure appropriate social distancing between operational gaming devices, for example, by removing every other gaming stool or covering the bill and ticket validator on every other machine. Guests should be discouraged from congregating around gaming devices.

Health and hygiene [reminders](#) and [instructions](#) must be posted publicly, in the view of patrons.

CONCLUSION

This Policy is subject to revision by the Board based on recommendations from federal, state, and local health authorities related to the spread of COVID-19. The Board will keep restricted licensees apprised of any changes so that licensees' practices can be updated.

From: RFG1 [REDACTED]
Sent: Tuesday, May 5, 2020 2:42 PM
To: publiccomment
Subject: Health and Safety Procedures for Non Restricted Licensees Once Operational: Table Games.

Esteemed Commission Members, Regarding Player limits per table for Poker games; unlike other table games, poker players compete with each other; not against the House. The House therefore derives it's fees utilizing a table drop based on the size of the Pot for each hand. Less players=smaller pot sizes. A normal table complement is 9 or 10 players. Reduction of the number of players to less than half that number will make all poker games un-profitable to the House and un-attractive to most players. I understand the need for reducing the number of players as a safety measure, but these regulations are meant to strike a balance between visitor safety and enterprise economic viability. Therefore, I ask the Commission to reconsider this limitation and increase the number of players at each poker table to a minimum of 6 players. This number will still offer some distancing at each table while making poker games more attractive and at least a break-even proposition for the house. This will facilitate the re-employment of a substantial number of poker dealers, enabling them to earn a paycheck and quality of life sustaining tips.

Thank You,
Sincerely,
Richard Gilliam.

Bell, Marie

From: Alan Feldman <alan.feldman@unlv.edu>
Sent: Wednesday, May 6, 2020 8:26 AM
To: publiccomment
Subject: Public Comment May 6

My name is Alan Feldman and I serve as Distinguished Fellow in Responsible Gaming at the International Gaming Institute at UNLV. Previously, during my 30 year career in the gaming industry working for both Mirage Resorts and MGM Resorts, I helped explain the industry's benefits, relevance, and importance to an often skeptical public around the world.

I also became extensively involved in problem gambling and responsible gaming issues. Today I serve as Chair of the Nevada State Advisory Committee on Problem Gambling and the Chair of the International Center for Responsible Gaming and am active in several US, Canadian and International PG/RG organizations.

As a Nevadan, I take great pride in the fact that Nevada has led the world in gaming practice, innovation and regulation for the entirety of the industry's commercial history. It is to our state that the world looks to find the latest policy advances through strict regulation of all persons, locations, practices and associations in the industry.

I am here today in response to the Industry Notice issued May 1 concerning health and safety guidelines for reopening. Responsible gaming constitutes an essential health and safety issue of critical importance to the industry and our state. It is therefore of critical importance to the public, the industry and the state that there is the inclusion of responsible gaming in the final health and safety guidelines for licensee reopening.

As our state confronts the health and safety issues of reopening, we must recognize that virtually all Nevadans entering casinos will have seen their financial situation decline. Our economic recovery should not include placing anyone in harm's way.

During these unprecedented times over the last 3 months, many customers may have experienced significant life events related to the pandemic that operators need to be cognizant of and have plans in place to address. Experiences that have traditionally been known to contribute to problem gambling may have been experienced by many returning customers, such as isolation, loss of income, loss of a loved one, or unemployment. These experiences may contribute to customers using gambling as an escape from the stress of the pandemic or as an attempt to recoup lost income.

It is vital that Nevada acknowledge this new reality in the context of gambling by encouraging licensees to enhance their responsible gaming programs to identify and appropriately respond to the unique circumstances created by COVID-19. This could include measures such as providing enhanced training to employees, creating specialized messaging for guests, and/or revalidating credit decisions.

Just as the guidelines previously issued by the GCB on this matter do not constitute new regulation, to be clear, I am not suggesting regulatory change but, rather, guidance so that licensees are encouraged to have player protection on their to-do list as the state reopens.

All of us at the University stand ready to support the Gaming Control Board, The Gaming Commission and the industry in any way we can to help facilitate recovery in a healthy and productive way and ensure that the public receives the necessary protections under these unique circumstances.

Thank you for your consideration.

Alan M. Feldman.

PUBLIC COMMENTS FOR NEVADA GAMING COMMISSION MEETING ON MAY 7

Hi, my name is Geoconda Arguello-Kline. I am the leader of the Culinary Union.

I urge the Gaming Commission to review the new UNITE HERE Culinary Union Public Health Guidelines for Gaming Facilities we have sent you. We believe our guidelines should be the minimum standards for re-opening and operating casinos during COVID-19. In addition, we ask the Commission to release publicly all licensees' re-opening plans so that the public can have confidence that Nevada casinos are taking all necessary actions to ensure worker and guest safety during the on-going the COVID-19 pandemic.

It is imperative that Nevada has the most robust protections for workers and guests in place when casinos are reopened. We have to reassure guests that we are ready for them, that they will be safe when they come back. If we don't get it right when we re-open, the long-term consequences for our industry will be devastating. There can be no shortcuts in how we prepare to re-open.

The guidelines we have sent you were developed in consultation with public health and industrial hygiene experts. Our guidelines have several components:

1. **Prevention:** This includes testing of workers for the virus and antibodies. There should also be screening of both workers and guests on entry with temperature checks. The amount of high-touch surfaces should be reduced.
2. **Protection:** PPE should be made widely available at no cost to workers and guests alike. Also, the casinos should ensure strict social distancing among guests and workers.
3. **Enhanced cleaning:** There should be more frequent and more intensive cleaning of all surfaces and all areas. The employers should ensure workers have the appropriate training and sufficient time to follow new cleaning protocols.
4. **Implementation and enforcement:** These guidelines will require detailed protocols unique to each gaming facility. Clear lines of authority, accountability, and monitoring must be established. To ensure that workers have a voice in ongoing implementation and enforcement, joint labor-management health and safety committees should be created.

Culinary Union members want to go back to work and provide for their families, but they are worried about what awaits them inside the casinos when they go back. Workers don't want to bring the virus back to their families from their workplaces. They need reassurances that their concerns are heard and their fears addressed. There is no better way to do it than letting them know that their union plays a key role in the state's discussion of how to safely and responsibly re-open our casinos.

Please review our public health guidelines and work with us to make the re-opening of Nevada casinos a great success. Thank you.



UNITE HERE's Culinary Workers Union Local 226 & Bartenders Union Local 165 Public Health Guidelines for Gaming Facilities During the COVID-19 Pandemic

These guidelines reflect direction from various public agencies and hospitality employers. Gaming companies in Nevada should collaborate with the Culinary and Bartenders Unions to establish detailed protocols to ensure implementation.

Implementation

- Each facility should establish detailed written procedures for implementing these guidelines. Such procedures should be supplied to all personnel in the language they are most comfortable with and to their bargaining representatives.
- Each facility should maintain an adequate stock of personal protective equipment (PPE), and should distribute such equipment at no cost to employees.
- Each facility should maintain detailed records of all actions taken in response to possible instances of COVID-19, including locations, sanitation measures undertaken, and individuals who have been identified as having come into contact with suspected carriers.
- Employers should inform employees who have had contact with individuals who have tested positive for or are suspected to have COVID-19, as well as their bargaining representative, that such contact has occurred and conduct appropriate contact tracing.
- A person with detailed knowledge of sanitation protocols should be designated on each shift. Employees should be informed of that person's identity and should report to that person all concerns related to the sanitary protocols, including the identity of possibly sick guests. Detailed logs of such reports, and resulting actions taken, should be maintained, and made available to employees and their bargaining representatives upon request.
- City or county governments should finance and mandate workforce development programs to ensure common training standards appropriate to the gaming industry in each market.
- Prior to the introduction of new workplace technologies, such devices should be evaluated for their impacts on public health, safety, and employees.
- Employers and employees with their bargaining representatives should form joint health and safety committees with timely dispute resolution language.

General Health

- Trained personnel should perform non-intrusive thermal screening on guests and employees upon entry into the facility. Any employee who exceeds 100.4°F (38°C) should be offered a second test no sooner than ten minutes after the first. Individuals with a temperature exceeding 100.4°F (38°C) should not be admitted to the facility, unless they present medical evidence (e.g. a doctor's note) that such temperature is likely due to a non-communicable condition.
- Employees denied work due to an abnormal temperature reading should receive on-site, employer-paid testing for COVID-19, and should be placed on fully-paid leave until test results are available.
- Employees should not be required to congregate such that they are unable to maintain a six foot separation from each other. This may require staggering shifts and/or pre-shift meetings.
- Break areas, employee dining rooms, training areas, and locker rooms should be configured so that all workers can maintain a six foot separation and should be cleaned frequently. Where this is not possible, break times should be staggered as much as practicable.
- Only non-touch timeclocks should be used. Biometric data should be strictly secured and should not be used for any purpose other than to log the employee's presence in the facility.

Return-to-Business

- All employees should be offered employer-paid tests to determine their current and past COVID-19 status. Tests should be provided with sufficient time for employees to receive results before they are scheduled to return to work. Employers should contract with third party organizations able to generate baseline statistics of past and present COVID-19 status across the workplace and should provide such statistics to employees and their bargaining representatives to the maximum extent permitted by law. Once an employee has been cleared to return to work by a health professional, the employer shall promptly return that employee to his/her previous position.
- All rooms used since the declaration of a Public Health Emergency should be thoroughly cleaned according to the procedures below.
- All rooms used by persons under quarantine or isolation orders, or otherwise exhibiting symptoms associated with COVID-19 during the preceding seven days should be cleaned and disinfected by a specially-trained group of employees according to the procedures below.
- Plumbing and HVAC systems should be inspected by appropriately qualified maintenance personnel to ensure their healthy operation.
- All employees should receive health and sanitation training in paid re-opening orientations.
- If COVID-19 has been detected at any time during the preceding fourteen days in the state or province where the facility is located, no employee should be compelled to accept work. Any employee electing not to accept work should be considered to be on involuntary layoff. Employers should not challenge applications for unemployment benefits by employees subject

to such involuntary layoff. Such employees should be permitted to return to work at any time according to regular scheduling practice.

- No employee should be disciplined or retaliated against for refusing work they believe poses a risk to themselves or others or for reporting work conditions that they believe may be unsafe.
- No employer shall issue attendance “points” or any form of demerits or discipline to any employee who calls out sick due to experiencing flu-like symptoms (fever, cough, shortness of breath), is subject to quarantine by the local health district or other governmental agency, is directed to self-quarantine by the employer or a healthcare professional, is diagnosed positive for COVID-19, or is absent due to their child’s COVID-19 related school closure.

Personal Protective Equipment

- Provide PPE at no cost to employees prior to each shift, and as equipment is soiled.
- For employees working in areas known to have been occupied by individuals under quarantine or isolation orders, or otherwise exhibiting symptoms associated with COVID-19, PPE should be provided so as to conform with CDC Prevention and Control Recommendations for Patients with Suspected or Confirmed Coronavirus Disease 2019 (COVID-19) in Healthcare Settings.
- For all other employees, the following PPE should be provided: surgical masks, disposable gloves, goggles or plexiglass barriers, disposable gowns and/or aprons, hair caps, biohazard disposal bags.
- Provide additional PPE necessary to ensure safe usage of all chemicals and equipment.
- Each facility should provide training on proper use of PPE, including procedures for donning and doffing.

Guest arrival and departure

- Guests should be asked to keep six foot separation from anyone who is not travelling with them.
- Guests should be offered surgical masks and asked to wear them while in public areas.
- Guests should not touch doors entering the facility. Doors should either be propped open, should open automatically, or should be opened by a doorperson.
- Shuttle buses should be thoroughly cleaned after each trip. Guests should not be allowed in the front passenger seat, and plexiglass barriers should be installed to protect drivers wherever practical. If any guest is found to be under quarantine or isolation orders, or to exhibit symptoms associated with COVID-19, the vehicle should be immediately cleaned in accordance with the CDC’s “Cleaning and Disinfection for Non-emergency Transport Vehicles” guidance.
- Lobby areas should be reorganized to permit orderly queuing so that guests maintain six foot separation. A service agent trained in security protocols should be appointed at all times to ensure compliance.
- Front desk counters should have plexiglass sneeze/cough guards installed.

- Contactless and cashless tipping systems for guest service providers (e.g. bellperson, valet, doorperson, guest room attendants, room service attendants etc.) should be provided.

General cleaning

- All common areas and surfaces should be cleaned and disinfected at least daily.
- An inventory of all high-touch surfaces should be created (e.g. doorknobs and handles, telephones, light switches, tables, chairs and work surfaces, desktops, washrooms, point of sale devices and menus). Cleaning and disinfecting of such surfaces should occur at least every hour.
- Elevator surfaces and buttons should be cleaned and disinfected multiple times per hour. An elevator attendant should be assigned to each guest and employee elevator.
- Clean visibly dirty surfaces before disinfecting, unless stated otherwise on the product instructions. Cleaning refers to the removal of visible dirt, grime, and impurities.
- Use disinfectants from the Environmental Protection Agency's List N. Follow the instructions on the product label.
- Floors and walls should be kept visibly clean and free of spills, dust, and debris.
- Empty and clean garbage cans in public areas regularly.
- Items that cannot be easily cleaned and disinfected should be removed (e.g., newspapers, writing pads, tabletop ornaments).
- All cleaning personnel should be given ample time to complete their tasks fully and safely.
- Uniforms should be laundered daily at no cost to employees.

Front-of-House food service

- Tables and barstools should be configured to maximize distance between parties, in conformance with public health guidelines.
- Banquet and convention areas should be setup to maximize distance between parties, in conformance with public health guidelines.
- Public areas in cafeterias should be organized to ensure orderly queuing to maintain physical distancing.
- Line servers and cashiers should have plexiglass barriers installed between them and the guests.
- Self-service trays, plates and utensils should not be made available.
- Extremely high-touch items (menus, salt/pepper shakers, etc.) should be replaced with disposable items.
- Foods that may have been contaminated from coughs or sneezes should always be discarded.
- Buffets and other self-service options (including water, soda, and coffee dispensers) should be suspended, except where meals are made available in sealed containers.
- Make plain soap and water or alcohol-based hand sanitizer available, including at cashier stations.
- Regularly clean and disinfect equipment used for handling payments.

- Regularly clean and disinfect carts used for transporting food and picking up dirty dishes and at least between every shift.
- Implement contactless tipping systems for bartenders, cocktail servers, servers, etc.

Kitchens

- Kitchens should be reconfigured wherever practical to create six foot spacing between stations.
- Where six foot spacing between stations is not possible, staggered shifts should be considered for physically distancing work (e.g. prep work).
- Utensils and kitchen surfaces should be cleaned regularly using standard sanitizing solutions (e.g., QUATs or chlorine). Product label instructions should be followed closely.

Dishwashing

- Dishes and cookware should be washed using regular procedures (e.g., sanitizing dishwasher)
- Used dishware from guests under quarantine or isolation orders, or otherwise exhibiting symptoms associated with COVID-19, must be washed and sanitized immediately.
- Food scraps should be scraped off manually from plates prior to beginning dishwashing. Use of sprayers should be minimized.
- Separately labeled “clean” and “dirty” carts and trays should be used for transporting food and for picking up used dishes. Carts and trays should be sanitized regularly, at least between every shift.
- Dish buckets (dirty and clean) should be cleaned and sanitized after each shift.
- Clean and dirty dishes should be kept separate at all times in the dish washing area.

Housekeeping

At least daily

- Cleaners should wash hands before entering and after leaving each guest room.
- Disposable paper towels and wipes should be used for cleaning.
- Vacuums should not be used.
- Linens should be changed daily and should be washed at high temperatures.
- Dirty linens and towels should be bagged. Wear disposable gloves when handling dirty laundry and discard after each use. Wash hands immediately after gloves are removed. Do not allow dirty linens to come into contact with clean ones.
- Separate carts should be used to carry clean supplies and to remove used ones. Carts should be clearly labeled “clean” or “dirty”. Carts should be sanitized between every shift. Guests should not be incentivized to forego daily housekeeping services.

Upon checkout

- Guest rooms should be thoroughly cleaned and disinfected after checkout.

- Carpets should be steam cleaned at a minimum temperature of 160°F (71°C).
- An adequate supply of hand soap and hand sanitizer should be available in the guest room. If individual bars of soap are provided, all remnants must be thrown out upon checkout.
- All glassware and dishes should be removed from the room. Alternatively, disposable glassware, dishes and utensils should be provided in rooms.

Guests reporting or showing signs of illness:

- Any guest reporting or exhibiting COVID-19 symptoms should be presumed infectious.
- Staff should not enter self-isolation rooms until authorized.
- Housekeeping or room service items should be delivered outside guest room doors.
- Daily service should be provided by a specially trained team
- Guest's trash should be collected from outside the guestroom door in a sturdy, leak resistant bag. It should be placed immediately in the hotel's main disposal container.
- Once the individual(s) in self-isolation have left a room, the room should be sanitized by a specially-trained team. The teams should complete a thorough cleaning of all hard surfaces with an approved disinfectant, launder all removable towels and linens, and steam clean items that cannot be laundered (plush chairs, drapes).

Room Service

- Food carts should not be delivered into guest rooms.
- "Clean" and "dirty" room service items should not be carried on the same cart.
- Room service items should not be collected from rooms occupied by isolating or quarantined guests, except by the specially-trained cleaning and sanitation team.

Laundry

- Disposable gloves should be worn when handling dirty laundry and discarded after each use. Wash hands immediately after gloves are removed.
- If reusable gloves are worn, gloves should be dedicated for handling dirty laundry and should not be used for other purposes. Wash hands immediately after gloves are removed.
- Do not shake dirty laundry.
- Dirty laundry should be placed directly into a linen bag without sorting. Do not overfill bags.
- Clearly mark laundry bins as "clean" or "dirty". Ensure dirty laundry only contacts dirty laundry bins, and clean laundry only contacts clean laundry bins.
- Clean and disinfect clothes hampers according to manufacturer's guidance. Consider using a liner that can be laundered.
- Clean and sanitize the front loading area of washing machines frequently.
- Wash and dry items in accordance with the manufacturer's instructions. Use the warmest possible water settings. Dry all items thoroughly.

Fitness Centers, Spas, & Pools

- These services should remain closed until public health authorities provide direction that they may be operated safely.
- Upon opening, these operations should be thoroughly cleaned and sanitized multiple times per day, as appropriate to customer volume.

Gaming

- Casino supervisors and managers should ensure that guests do not congregate in groups and queue appropriately so that guests maintain six foot separation from each other and from employees, particularly at cage cashiers and in sports book and simulcast rooms.
- Protective barriers should be installed at all cages and cashier stations.
- Slot machines and table games should be turned off and/or reconfigured with the chairs removed to allow for six foot separation between guests.
- Slots, tables, and table game equipment (dice, chips, etc.) should be sanitized frequently.

Subcontracted and outsourced services

- Subcontracts for guest transportation, food production and delivery, laundry, and other guest services should require the service provider to implement the standards in this document. Subcontractors should have a direct employment relationship with their personnel to ensure conformance with these standards and to facilitate contact tracing.

PUBLIC COMMENTS FOR NEVADA GAMING COMMISSION MEETING ON MAY 7

Hello, my name is Shawn Best and I have been a banquet cook at the Cosmopolitan since it opened over 9 years ago.

I was there the day my casino closed due to the coronavirus pandemic. I walked around the property and I wanted to cry because it was like a ghost town in there.

After being laid off I have been receiving unemployment benefits. I know coworkers who haven't been able to collect unemployment even though they filed in March.

Now that Nevada is beginning to think about reopening I ask that my employer work with my union to implement public health guidelines so that me, my coworkers, guests are protected.

I'm a cook and interact with hundreds of other workers in one shift. From getting on a shuttle bus to go to casino from the parking lot to guests who stop to ask me a question as I walk to and from my kitchen inside the property.

The health and safety of workers and guests has to be a priority.

My coworkers and I are frontline workers and our employer should work with the Culinary Union to ensure that appropriate public health protections are in place to safeguard both workers and casino guests.

Thank you.

PUBLIC COMMENTS FOR NEVADA GAMING COMMISSION MEETING ON MAY 7

Good morning, my name is Gladis Blanco. I am a guest room attendant at the Bellagio. I have worked there for 8 years.

After my casino closed due to the Coronavirus pandemic I was laid off. Bellagio only paid me 2 weeks. I have not been able to receive unemployment benefits yet and I didn't qualify for the stimulus check.

I have some money saved and have been using my savings to help support my family. I don't know what will happen after my savings runs out at the end of next month. Since March 17th, I've stayed home to do my part to flatten the COVID-19 curve, protect my family, and my community.

I am ready to go back to work, and I know my co-workers in Las Vegas are too, but we need to know that we'll be safe when we return.

I am a frontline hotel worker. As a guest room attendant, I interact with guests frequently throughout the day. I am scared of touching dirty bedding/towels or trash than getting the virus and infecting my two children.

I ask MGM Resorts to work with my union in setting high public health standards. We need the protections that these guidelines will provide.

Strong protections that keep both workers and guests safe are essential for the re-opening of the hospitality industry in Las Vegas to be a success.

Thank you.



Reno
Problem
Gambling
Center

Nevada Gaming Commission
Nevada Gaming Control Board

May 6, 2020

Dear Chairwoman Morgan and Members of the Board,

My public comment for the May 7, 2020 meeting of the Gaming Control Board is as follows.

The COVID-19 pandemic has had deep effects on Nevada, in particular for those involved in the business of gaming and those, like myself, on the front lines of caring for Nevadans affected by problem gambling. I am a Marriage and Family Therapist (MFT) specializing in treating gamblers and family members. I am the CEO and Clinical Director of the Reno Problem Gambling Center (RPGC). I have been treating families in Northern Nevada for 28 years. I currently serve as the Vice-Chair of the Governor's Advisory Committee on Problem Gambling (ACPG). I created and continue to teach "Exploring Gambling Behaviors" online at UNR. I have advocated for the care of Nevada families in classrooms, courtrooms and legislative meeting rooms and will continue to do so. I am hopeful that responsible gambling guidelines as well as gambling prevention and treatment services will be addressed by the Gaming Control Board as you guide the re-opening of gaming business during the pandemic.

I suggest that responsible gaming efforts need to be highlighted and increased with the emphasis on helping Nevadans in pandemic distress. Responsible gaming direction is essential. Nevadans are anxious, and gambling can be a form of relaxation that for people in distress could quickly become a place to hide, an escape, or worse, an illusion of a solution to problems and an addiction.

Experts in problem gambling prevention and treatment are prepared to work in concert with responsible gaming business representatives. I ask that you bring attention to the importance of these essential services in your messages to Nevada gaming licensees and help guide a collaboration that can address our public health needs now.

Respectfully at your service,

Denise F. Quirk, M.A.
MFT, LCADC, BACC-ICGC-II, CPGC-S

527 Humboldt Street, Reno, NV 89509 Ph: 775-284-5335 Fax: 775-284-5336
Website: www.renopgc.com Email: renoproblemgambling@gmail.com

Bell, Marie

From: Jennifer Shatley <jennifer.shatley@unlv.edu>
Sent: Wednesday, May 6, 2020 12:28 PM
To: publiccomment
Subject: Public Comment May 7th

Nevada Gaming Commission

May 7th, 2020

Dear Distinguished Members of the Nevada Gaming Commission,

I would like to submit the following public comment for the May 7, 2020 meeting of the Nevada Gaming Commission.

My name is Jennifer Shatley. I previously served as the Vice President of Responsible Gaming Policies and Compliance for Caesars Entertainment and now consult for a multitude of stakeholders, including operators and problem gambling non-profit organizations. In addition, I serve as the President of the Nevada Council on Problem Gambling and as a Research Assistant at the International Gaming Institute.

Throughout my twenty-two year career, I have advocated within the gambling industry to deliver gambling in a socially responsible manner. My focus has been to promote safer industry practices and provide protections for those who experience harm. My objective was to be mindful of the business while creating protections for vulnerable populations.

I believe, given the current circumstances created by COVID-19, this pursuit is now more important than ever. Most customers that will be returning to the casinos will have experienced life events that research has proven contributes to problems with gambling responsibly, such as loss of employment, isolation, extreme levels of stress, or loss of a loved one.

Further, this pandemic has caused many Nevadans to experience at least a partial loss of their income and, in many cases, incur tremendous debt. This may lead to desperation to use gambling as a means to attempt to generate revenue, further contributing to their precarious financial situation.

As you issue guidelines to protect the health and safety of casino customers, I hope that you will include responsible gaming as an important component in your guidance to Nevada gaming licensees as the public health of Nevadans is just as important as the economic health of Nevada.

Thank you for your consideration.

Best regards,
Jennifer Shatley

May 6, 2020

To the esteemed members of the Nevada Gaming Commission,

I applaud the Board for laying out policies to mitigate and reduce the risk of exposure to COVID-19. However, I urgently ask you to consider including language that calls attention to maintaining strong Responsible Gaming standards as part of the reopening process.

Many of Nevada's most well-known gaming companies have, for years and even decades, developed and implemented Responsible Gaming standards that far exceed Nevada's regulatory requirements, and they are to be commended for doing so. Many of these same organizations and affiliated institutions are also members of the American Gaming Association, which requires its members to adhere to a Code of Conduct in which they agree to prioritize Responsible Gaming as an integral part of their daily operations. RG standards have long included not only responsible gaming by patrons, but prevention of underage gambling, responsible alcohol service and consumption, and a significant ethic in the training of team members. In fact, I would go so far as to suggest that many of the facets of re-opening Nevada's gaming industry, including the reconfiguration of the gaming space and policies governing casino operations, are actually best viewed through the lens of RG which is, at its core, entirely focused on creating a safe, entertaining, and supportive environment for both patrons and team members.

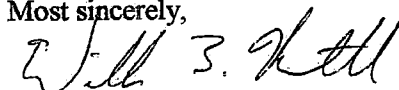
The first people to return once gaming begins to reopen are likely to include a higher than usual percentage of individuals who are already suffering from a gambling disorder, and others who are suddenly at higher risk for developing a gambling problem specifically because of the COVID-19 pandemic. The financial, emotional, and psychological impacts brought about by factors such as isolation, trauma, and loss due to the events of the past two months create a dangerous cocktail for those individuals who may be predisposed to problem gambling, and therefore not cognitively equipped to make healthy decisions with regards to their personal gambling behaviors.

I am a person in long-term recovery from a serious gambling problem that nearly destroyed me and my family. It was, in part, resources from RG programs in place within the industry that allowed me to find help when I needed it most. The result was not only my recovery from my gambling disorder, but a much greater connection to my community and state, in which I've had the opportunity to advocate for prevention and awareness of this illness, contribute new research, participate in RG training for gaming employees, and serve the great State of Nevada in an advisory capacity on this issue under three different governors.

Recent actions taken by some in the gaming industry in the name of fiscal exigency to eliminate positions that oversee and direct their RG programs set a dangerous precedent and send the wrong message to returning patrons. For the sake of people like me, the desire to have people back at our amazing properties *cannot* and *must not* be a reason for minimizing or setting aside RG standards, at this time more than ever. In the Introduction section of the document being considered, the Board expresses that it "...remains resolute in ensuring that gaming operations in this State do not compromise the health and safety of Nevadans." Please ensure that this remains so by including language addressing the need to maintain strong RG practices throughout this process and into the future.

Thank you for your consideration of this matter.

Most sincerely,



William "Ted" Hartwell

May 7, 2020

Acting Chairman Moran and Members of the Nevada Gaming Commission,

Thank you for the opportunity to provide public comment today. My name is Carol O'Hare and I am the Executive Director of the Nevada Council on Problem Gambling. The Nevada Council is a private, non-profit organization whose mission is to generate awareness, promote education, and advocate for quality treatment and recovery resources for problem gamblers and their families. We are an Affiliate of the National Council on Problem Gambling and do not take a position for or against legal gaming.

Since mid-March, Nevadans have followed the Governor's directives to slow the spread of Covid-19 by staying home, practicing appropriate hygiene and social distancing protocols, and shutting down all non-essential businesses, including the entire gaming industry. These drastic steps were necessary to protect the health and safety of Nevadans, but they have also come with a painful price.

For many in our community, the sudden isolation, restrictions on normal daily activities, and complete uncertainty about the future, are creating unprecedented levels of anxiety and fear, along with financial insecurity and in some cases, significant financial devastation. This is a difficult time for us all, but even more so for the 6% of Nevada adults who may have a gambling problem. For them, this could be a tipping point into desperation and further destruction when gaming operations resume. Gambling, for the problem gambler, is NOT a safe and healthy activity – it is an addictive behavior that progresses over time and accelerates in frequency and impact as they use gambling to escape from the increasing mental, emotional and financial distress in their life.

It is against this backdrop that the Commission will now consider the adoption of Health and Safety Policies for Resumption of Gaming Operations. In addition to the proposed policies you will be discussing, we ask that you also include guidance for gaming licensees to insure compliance with the full requirements of Regulation 5.170 – Programs to Address Problem Gambling, adopted by the Commission in 1998, as well as all additional Responsible Gaming policies subsequently adopted in other areas of gaming regulation.

The complete restart of gaming operations provides a unique opportunity for the Gaming Control Board to proactively promote Responsible Gaming efforts in Nevada. Health and Safety policies should address mental as well as physical health concerns, especially now, as the pandemic is negatively impacting all areas of health and safety for our citizens.

Specifically, we ask you to include the following in your final Health and Safety policies:

- 1) Direct all companies to review their existing Responsible Gaming policies and refresh their efforts in this area.
- 2) As you require licensees to educate their staff and patrons about Covid-19 sanitation and safety protocols, we ask you to also direct them to provide Responsible Gaming messaging about the risks of using gambling as a coping mechanism in times of stress, or trying to solve financial difficulties through gambling.
- 3) Require each company's reopening plan to include identification of the designated staff member who manages the company's Responsible Gaming policies and programs. With the likelihood of personnel changes and layoffs at all levels, it is important for each company to insure someone has been assigned this responsibility and communicate that to employees, community partners and gaming regulators.

The Nevada Council on Problem Gambling is proud of our history of working collaboratively with all stakeholders, to reduce the impact of problem gambling in our state. We know there will be highly vulnerable people who need information and resources now more than ever, and we believe that inclusion of these simple directives will assist in these efforts. We also feel these directives are appropriate to be included in the Health and Safety Policies for Resumption of Gaming Operations that will be adopted by the Commission.

The Nevada Council will continue to work with all stakeholders who share our concern and commitment to provide help and hope for individuals and families affected by problem gambling. We are available to assist Nevada's gaming companies, the Control Board and the Commission in any way we can to insure effective Responsible Gaming efforts are in place to support the Health and Safety of all Nevadans, and all out of state visitors when they return.

Sincerely,



Carol O'Hare, Executive Director

Nevada Council on Problem Gambling

When the Fun Stops...Help is just a call, or click, away.

24 Hr. HelpLine: 1-800-522-4700 www.WhenTheFunStops.org

[REDACTED]

From: Danielson, Don [REDACTED]
Sent: Thursday, May 7, 2020 7:46 AM
To: publiccomment
Subject: Public Comment for NEVADA GAMING COMMISSION For SPECIAL MEETING May 7, 2020

RE: Public Comment for NEVADA GAMING COMMISSION For SPECIAL MEETING May 7, 2020

For your consideration:

NOTE: Virtually all actions/suggestions ultimately employed by NGC should be based on reasonable interpretation of conclusive, supporting scientific data, combined with practical "common sense" TO MITIGATE SPREAD/TRANSMISSION OF COVID-19.

- 1) use of certified/approved facial/mask PPE should ALSO be required for patrons during gaming activities. (ideally, gaming establishments should make available these devices; perhaps for a fee payable by the patron) Optionally, patrons should be required to wear facial PPE while in gaming premise.
- 2) Use of products that emanate smoke from a combustible source (ie: cigarettes, cigars) should be restricted, limited, or prohibited at ALL gaming property locations.
- 3) IF table games are to have limited patron participation (quantity of patrons at a given table game), approved/governed game "rules" that were in effect before March 21, 2020 shall not be altered during said modified patron limitation. For example, game rules can not be modified in order to theoretically improve "house odds".
 - 3a) IF patron maximum occupancy is to be modified (reduced) throughout a gaming facility (casino), no "game of chance", including table or machine, no alteration of electronics, software, firmware, or hardware, or conditions of any game should be permitted. (this proposal would help to circumvent a casino's attempt to improve their odds; thus improving revenue during declining business/gaming activities)
- 4) Because current scientific data supports the contention that COVID-19 is primarily spread / transmitted via the "air", mitigation efforts should be focused around this premise.
- 5) Patrons that appear to be of ill-health shall not be permitted on casino premises AND patrons & employee age-restrictions should be considered. (current scientific data supports the contention that individuals of certain compromised health conditions AND those aged 65+ are more susceptible to contracting COVID-19 with health-jeopardizing consequence)
- 6) Gaming machines shall be either a) physically spaced 6 ft. apart, or b) "active"/"live" machines shall be distanced 6 ft. apart.
- 7) Food & beverage service shall be suspended throughout a gaming facility. {alcoholic & non-alcoholic beverages can be (perhaps) offered in ways that do not compromise the possible transmission of COVID-19, or other, unidentified infectious viruses}

Regards,

Don Danielson
Reno, NV



School of Community Health Sciences
University of Nevada, Reno

May 6, 2020

Nevada Gaming Commission
Re: Public Comment for May 7, 2020 Special Meeting

Dear Chairman Tony Alamo,

I write to strongly encourage you to consider re-opening Nevada's casinos as smoke-free establishments as part of Governor Sisolak's "Nevada United: Roadmap to Recovery" plan.

I am an Assistant Professor in the School of Community Health Sciences at the University of Nevada, Reno. I have nearly \$2 million in research funding from the National Institutes of Health, have authored over 100 scientific articles on cigarette smoking and vaping, and was a Contributing Editor to the most recent U.S. Surgeon General's report on e-cigarettes. It is my expert opinion that the state of the science supports the following statements:

1. **Allowing smoking in casinos will increase COVID19 transmission.** The act of smoking includes frequent hand-to-mouth behavior. On average, smokers take 10 puffs from a single cigarette. When mixed with playing slots or table games on the casino floor, this is exactly the behavior that will transmit COVID19 among casino patrons and employees. Additionally, smoking requires the removal of face masks. The Centers for Disease Control recommends face mask wearing as an essential strategy to reduce the spread of COVID19. [Designating Nevada's casinos as smoke-free will enhance workforce protection and improve public confidence in the safety of returning to the State's gaming establishments.](#)
2. **The overwhelming majority of smokers want to quit smoking.** Re-opening Nevada's casinos as smoke-free will facilitate Nevadans to quit smoking, which in turn will improve their health. Simply put, the fewer cigarette smokers we have in the state, the less healthcare infrastructure we will need, the less money the State will spend on programs such as Medicaid, and most importantly, the fewer deaths we will suffer from this entirely person-made health threat.

Thank you for your consideration of my recommendation. Please contact me if you would like to discuss this topic further.

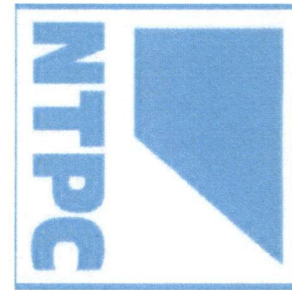
Sincerely,

Jennifer Pearson
Assistant Professor
School of Community Health Sciences
Division of Social and Behavioral Sciences/Health Administration and Policy
University of Nevada, Reno

School of Community Health Sciences
1664 N. Virginia Street
University of Nevada, Reno/274

May 7, 2020

Nevada Gaming Commission
Re: Public Comment for May 7, 2020 Special Meeting



Dear Chairman Tony Alamo,

The Nevada Tobacco Prevention Coalition (NTPC), comprised of collaborating public health and private partner organizations, strongly supports the Commission's efforts to ensure the safe reopening of gaming operations in the State as part of Governor Sisolak's "Nevada United: Roadmap to Recovery" plan.

NTPC requests the Commission include recommendations on smoke free gaming establishments in the Nevada Gaming Control Board Health and Safety Policies for the Resumption of Gaming Operations for both nonrestricted and restricted licensees. Evidence suggests smokers are at an increased risk of contracting COVID-19 and having complications from the virus. In addition, recommending smoke free gaming establishments will reduce the risk of spreading the virus from individuals that will have to remove their face covering/mask to utilize their smoking device. This recommendation will strengthen the CDC Social Distancing Guidance referenced in the proposed health and safety policies as well as provide safe and welcoming environments for employees and patrons.

NTPC thanks the Nevada Gaming Commission for their consideration of this proposed recommendation and encourages members of the Commission wanting to discuss this recommendation in more detail to reach out to myself or our Operations Coordinator Barbie Csore with any questions. I can be reached at tallison@pdcnv.org or (775) 782-8611. Barbie can be reached at Barbie@nevadacancercoalition.org or (775) 737-9302.

Respectfully,

Taylor Allison

Taylor Allison
Nevada Tobacco Prevention Coalition Vice-President
Partnership Douglas County

Cc: Board of Directors: Kelli Goatley-Seals, Washoe County Health District; Toni Orr, Carson City Health & Human Services; Michael Hackett, Alrus Consulting; Tom McCoy, American Cancer Society; Malcolm Ahlo, Southern Nevada Health District; Nicole Olmstead, American Heart Association; Will Rucker, American Lung Association; Christine Thompson, Nevada Cancer Coalition; Jaron Hildebrand, Nevada State Medical Association; Nicole Alberti, Washoe County Health District; Beverly Daly-Dix, Clark County Medical Society Alliance; Chris Needham, Prominence Health Plan; Jennifer Pearson, University of Nevada, Reno, School of Community Health Sciences

Bell, Marie

From: John F. O'Reilly <jor@oreillylawgroup.com>
Sent: Thursday, May 7, 2020 9:09 AM
To: publiccomment
Subject: FW: NEVADA GAMING COMMISSION SPECIAL MEETING MAY 7, 2020....(ITEM 1---
PUBLIC COMMENTS)

Mr. Chairman, Members of the Commission, Chairwoman and Members of the State Gaming Control Board and Madam Executive Secretary,

My name is John O'Reilly. I am Chairman/CEO of O'Reilly Law Group. I am appearing by email today as a member of the Las Vegas Community and not on behalf of any gaming or other client. I also currently serve in our Las Vegas Community in other capacities in the gaming industry and am also now and have been very active in the health care community and with UNLV and the Vegas Chamber. I am a licensed real estate broker and contractor. I have previously served as the Chairman of the Nevada Gaming Commission. I have also served on the Nevada Gaming Policy Committee, as the Chairman/CEO of a NYSE Gaming Company, on the board of another NYSE company and other companies and in numerous other business and volunteer capacities. I moved to Las Vegas in 1969 to serve as a prosecutor, military judge, and contracts officer with the USAF office of the Judge Advocate General (Nellis Air Force Base).

I am appearing today initially to say THANK YOU to Governor Sisolak and his staff and all NGC and GCB members and staff. I realize it is a very difficult job and you have worked hard, along with many others who have been assisting you, day and night. Once again, THANK YOU.

I am also appearing today to ask you to consider (and in the Board's case reconsider) each and every requirement of the policies set forth on Exhibits A and B (Proposed Policies) and the related costs and benefits of each such requirement. It will be a time consuming endeavor but is vitally important to the immediate and on-going success of our gaming industry and our Great State of Nevada. We trust our licensees with complex and demanding gaming regulatory matters including self-reporting violations. We can and must continue to trust them to exercise caution and prudence in dealing with their employees and guests without adding additional expensive and time consuming burdens unless absolutely necessary and cost justified.

The creativity and competitiveness of our Nevada Gaming licensees has changed the World by taking what some would say was/is a bad habit (gambling) and truly changed the world of entertainment....all around the World. If we continue to encourage our gaming licensees creativity and competitiveness, and do not overburden them and our regulatory process, we and they can work together to make Nevada a world leader in various areas of health, health care and healthy living just like we have done in the world of gaming and entertainment and safety. We can take this very challenging set of circumstances and work to create an even healthier environment for our employees and our visitors. The failure to do so will be more losses and failures than we want to or can afford to experience in our Great State of Nevada.

I realize the issues facing the industry are extremely urgent. If there is anything I can do to assist in further reviewing and modifying these Proposed Policies, I will devote whatever time is needed. I will also prevail upon our contacts to further assist in any way possible including those in the world of health care.

Our restricted and non-restricted gaming licensees (and their tenants, contractors, employees, suppliers, unions, and other directly and indirectly related persons and businesses) are now, as a result of the COVID-19 challenges, facing

some extremely difficult business and financial challenges....some challenges in fact nearly insurmountable and some that will be insurmountable and lead many to leave the industry voluntarily or involuntarily. I am hopeful that whatever Proposed Policies the NGC and GCB choose to enact, those actions will not exacerbate the existing challenges but rather will assist the industry and recognize that whatever action is taken must be consistent with the statutory declaration of Nevada public policy that the gaming industry is vitally important to the economy of the State and the general welfare of the inhabitants.

Once again, in light of the challenges that now exist for all, please review and consider in detail each and every provision of both Exhibits A and B and consider, among many other questions, the following:

1. Does our gaming industry really need each and every one of these Proposed Policies to be imposed on them by the NGC or the GCB or can we rely on our licensees to use best practices and follow the health and safety requirements of the Federal and local agencies? Our industry licensees have been trusted for years to comply with all health and safety requirements for their employees and their customers/patrons. They have the most to gain and the most to lose....by far.
2. If any or all of these Proposed Policies are truly deemed necessary to be imposed by the NGC, are the NGC and GCB prepared to enforce each provision with disciplinary action? For example, if one or more licensees fail to "...create and implement a plan to prevent the spread of COVID-19 and infectious diseases ("Plan")", what disciplinary action would you consider? This is one of several examples. Is such a Plan needed or even possible? Do "infectious diseases" include the flu, sexually transmitted diseases, and any other similar disease now and in the future?
3. Can gaming licensees afford to open or stay open if they are required to operate any part of their operations at 50% capacity?
4. What additional overhead and related costs (licensee and regulatory) are required individually and collectively by the Proposed Policies?
5. Do the Proposed Policies further subject our industry to tort claims for alleged failures to comply with any one of the Proposed Policies?
6. Are the Proposed Policies actually in effect a Regulation(s)? Is "Review" and/or "Ratification" the appropriate process for adoption? Does the Governor's order supersede the NRS and, if so, for how long? If the Proposed Policies are legally challenged will that further exacerbate the existing COVID-19 challenges and incredible economic challenges on all in Nevada?
7. Are there now or in the coming days, weeks and months more effective and efficient health care approaches than those required by the Proposed Policies? Who will determine what can be done promptly as these rapidly evolving changes occur?
8. How many governmental entities are currently regulating the health issues and procedures of our gaming industry and do the NGC and GCB plan to change Exhibits A and B as required going forward which could be daily or weekly if our licensees are going to be given timely direction?
9. How long will these Proposed Policies be effective as mandates for gaming licensees? Will the NGC have any input in any modifications?
10. Do the NGC and GCB have all of the health and medical information and expertise needed to impose these additional burdens on Nevada gaming licensees including, for example, what capacity issues if any our hospitals now have or have had during these COVID-19 challenges (which seemed to be the primary health and safety issue that was one of the primary bases for the declared emergency)?

Each of these issues and questions, and many others, may be able to be minimized if the Proposed Policies are modified to provide guidance and suggestions as opposed to regulatory demands and requirements.

Once again, please accept my sincere appreciation to each and every one of you and to the Governor and his Team. I fully realize the challenges of what you have been doing and will continue to undertake. I am hopeful my comments

and suggestions are received in the spirit in which they have been submitted from an individual who has invested most of his life in our Great State of Nevada. I am prepared to do whatever else can be done to assist.

Sincerely,

John



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May 7, 2020

Nevada Gaming Commission
Re: Public Comment for May 7, 2020 Special Meeting

Dear Chairman Alamo,

Nevada Cancer Coalition strongly supports the Commission's efforts to ensure the safe reopening of gaming operations in the State as part of Governor Sisolak's "Nevada United: Roadmap to Recovery" plan.

Nevada Cancer Coalition requests the Commission include recommendations on smoke free gaming establishments in the Nevada Gaming Control Board Health and Safety Policies for the Resumption of Gaming Operations for both nonrestricted and restricted licensees. Evidence suggests smokers are at an increased risk of contracting COVID-19 and having complications from the virus. In addition, recommending smoke free gaming establishments will reduce the risk of spreading the virus from individuals that will have to remove their face covering/mask to utilize their smoking device.

This recommendation will strengthen the CDC Social Distancing Guidance referenced in the proposed healthy and safety policies as well as provide safe and welcoming environments for employees and patrons.

Nevada Cancer Coalition thanks the Nevada Gaming Commission for their consideration of this proposed recommendation and encourages members of the Commission wanting to discuss this recommendation in more detail to reach out to me or to Executive Director Cari Herington.

Respectfully,

Christine Thompson
Cancer Prevention Programs Manager

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Nevada Cancer Coalition unites and leads community partners to improve the health of Nevadans through cancer prevention and early detection, education, and advocacy. NCC is a 501(c)3 non-profit organization.

ATTACHMENT - PUBLIC COMMENT #1
MAY 7, 2020