



PLAINRIDGE PARK  
CASINO

**PROTOCOLS FOR CONDUCT OF LIVE RACING UNDER COVID-19**

The conduct of live harness racing in a safe, controlled and sustainable fashion is the paramount and shared goal of stakeholders Plainridge Park Casino (PPC), the Harness Horsemen's Association of New England (HHANE) and the Massachusetts Gaming Commission (MGC).

The following policies shall be put into effect with the start of live racing at PPC at a date to be determined based on guidance from the State, the MGC and health officials.

The goal of these procedures shall be to meet or exceed the recommended guidelines as set forth by the Centers for Disease Control (CDC), the Massachusetts Department of Health, local health officials and shall be consistent with the comprehensive outline for dealing with COVID-19 as set forth in the state's "Reopening Massachusetts" plan published on May 18, 2020, and with the Minimum Requirements set by the MGC.

All of the enclosed procedures are subject to constant review by the stakeholders and outside health experts with any updating or changes being communicated to stakeholders in an expedited fashion.

**General Guidelines:**

PPC, HHANE and MGC shall develop a communication checklist with contact information of key members of each organization (cell phone/email) to establish and execute procedures in the execution of the attached protocols. Horsemen and PPC employees will be encouraged to sign up for PPC Textcaster system to receive pertinent and up to date information via text messaging.

PPC shall develop a communications plan to inform guests of its expectations regarding COVID-19. PPC's communications plan, website, and signage at points of entry shall list COVID-19 symptoms and direct guests not to visit/enter if they indicate "YES" to feeling or exhibiting any symptoms. The communications plan, website, and signage also shall direct guests not to visit/enter if they have traveled to any CDC Level 3 Warning country in the past 14 days (list countries), or have come into close contact with an individual with a confirmed case of COVID-19 in the past 14 days, and shall further discourage people at increased risk for severe illness or who are generally feeling ill from entering the property.

While on the grounds of PPC all individuals shall wear a suitable face mask at all times that covers the nose and mouth. The only exception is for horsemen while racing or training a horse

while on the track.

At all times, individuals on the grounds of PPC shall follow appropriate social distancing (maintaining at least a 6-foot clearance from any other individual). Individuals should not congregate in groups. Individuals may be removed from PPC grounds for failure to adhere to rules/protocols put in place.

PPC, MGC and individual horsemen shall be responsible for training their employees on COVID-19 best practices including reminders on social distancing requirements, outlining proper hygiene (including frequent hand washings and regular use of sanitizer) and ensuring the use of face masks at all times.

Horsemen should make themselves aware of potential COVID-19 symptoms and check themselves for symptoms prior to their arrival at PPC. Individuals showing signs of symptoms shall not enter the restricted areas and should take proper precautions to self-quarantine or seek medical attention.

All individuals entering PPC racing areas shall be temperature checked by Security. Anyone with a temperature of 100.4 degrees Fahrenheit or higher will be logged by Security and shall not be permitted entry and will not be permitted to enter PPC grounds for a minimum of fourteen (14) days.

Employees of PPC and MGC shall follow the published requirements in place by their employers regarding presence of potential COVID-19 symptoms and their ability to work under such conditions.

All horsemen entering PPC grounds shall sign and have on file a COVID-19 release form.

**Access to Racing Areas:**

Access shall only be through designated points of entry as determined by PPC.

All individuals will be temperature checked at the Security checkpoint.

All individuals must have MGC license or authorization visible and will be logged in by security.

Access shall be restricted to essential, MGC licensed or authorized personnel required for the conduct of live racing (or qualifiers.) Essential personnel shall be defined as:

- PPC racing officials/staff
- PPC maintenance staff
- MGC racing officials/staff
- Trainers
- Drivers

- Grooms
- Veterinarians
- Farrier
- Outrider
- Medical personnel
- Any other positions or individuals as determined by PPC or MGC

No owners, unless they fall under a category listed above, shall be permitted access to any restricted racing areas. No guests shall be permitted entry to restricted areas and no one under the age of 16 shall be permitted in the restricted racing areas.

Only individuals with horses entered to race on that day or have prior approval from MGC and PPC shall be permitted access to the restricted racing areas.

### **Ship-Ins/Barn Area**

Only horses approved by the Racing Secretary shall be approved to ship in. Proper equine health information for each horse arriving at PPC is required.

Parking for ship-in vehicles shall be designated by PPC.

Only horses racing on that day may ship in. No training of horses will be permitted at any time.

All horses shipping onto grounds of PPC will be assigned specific stalls by the Racing Secretary. Spacing of stalls to promote social distancing requirements shall be done.

Horses requiring Lasix shall be required to arrive in time for Lasix to be administered no later than four (4) hours prior to the scheduled post time of their race. Horses not requiring Lasix shall arrive no later than three (3) hours prior to their scheduled race post time.

Lasix will be administered outside at a designated Lasix veterinarian's office no later than four (4) hours prior to the scheduled post time of their race.

Only minimum staffing may accompany each horse brought on the grounds. A trainer with only one (1) horse shall have only one groom accompany the horse. A trainer with 2-5 horses may have two (2) grooms. Exceptions shall be made for those individuals that are a driver/trainer with one groom for every two horses entered shall be permitted in such situation, or at the discretion/approval of the Racing Secretary and MGC.

Individuals in the barn area should exhibit proper social distancing at all times and wear a proper mask covering the nose and mouth at all times.

Horsemen, Trainers and their contractors/vendors/employees shall be responsible for cleaning frequently touched surfaces (e.g. faucets, door handles etc..) throughout the barn areas where they are assigned and shall be responsible for making sanitizer available for their contractors, vendors, and employees in the areas where they operate.

PPC will clean all common areas of the paddock and barn area and provide sanitizer in those same areas.

Identification of horses shall take place at ship in stall.

Horses shall prepare and warm up prior to their races from ship-in stalls. Saddle pads will be left at each stall. Horses should not proceed to the paddock until their race is called.

Individuals may bring their own food and beverages to the barn area but should not share and should dispose of trash in proper receptacles.

Horsemen are required to thoroughly clean their assigned stalls prior to leaving and PPC shall keep records of individuals not adhering to this requirement. All trailers and equipment shall be thoroughly cleaned and disinfected. No overnight stabling of horses shall be permitted unless it is an emergency situation and approved by the Racing Secretary.

### **Race Paddock**

Only individuals associated with horses approved to be in the paddock should be present.

The paddock judge will assign races/horses to the appropriate paddock stalls. Every effort will be made to provide separation between horses and races in paddock and to rotate use of paddock stalls throughout the race card. Paddock stalls will be disinfected daily with CDC-approved cleaning solutions.

Horsemen should make efforts to assist in cleaning all common equipment/high touch point items in paddock (cross ties, faucets) and sharing of equipment or tools should be discouraged. Use of work gloves is encouraged.

Saddle pads shall be cleaned and disinfected after each race.

Paddock lounge shall be locked. Individuals shall not congregate in any common area of the paddock (near TV, etc.) and are encouraged to practice safe distancing including moving outside, weather permitting, whenever possible.

Only the bathrooms shall be utilized in locker room facilities. Staff shall be deployed regularly to clean and disinfect restrooms and other high touch point locations.

Driver/Trainers should arrive at track with colors (and a spare or change if needed) and their necessary equipment for the race day.

Individuals should not enter any racing official's office areas in the Paddock unless instructed.

Proper distancing should be practiced with horses going from paddock to the racetrack and from racetrack to paddock. Weather permitting, drivers should get on/off their race bike outside of the paddock. Drivers should regularly clean their race bikes.

No winner's circle ceremony shall take place. The photographer will attempt to take a win picture with the driver only.

### **Racing Office**

No individuals other than race office staff and MGC shall be permitted in the racing office building. All individuals must wear masks covering the nose and mouth.

Office space use and configuration shall comply with the Sector Specific Workplace Safety Standards for Office Spaces to Address COVID-19 as issued by the Department of Labor Standards.

All entries will be made on-line or via telephone; racing updates shall be communicated via Textcaster.

All draws will be done via conference call or other approved method.

### **MGC**

Horsemen are responsible for bringing their own pens to Lasix administration and the Test Barn.

Horsemen shall stand on the opposite side of their horse from the veterinarian during blood draws.

Horsemen will observe the sealing of samples from outside of the Test Barn office to maintain social distancing.

### **MGC Offices/Licensing**

License applications shall be emailed, faxed or mailed to the MGC Division of Racing.

Judges hearings shall be held via video or conference call when possible.

### **Racing Officials/Employees in Main Gaming/Racetrack Building**

Only essential racing officials, employees and 3<sup>rd</sup> party vendors shall be permitted in the main gaming/racetrack building (“main building”) during racing. (Until such time as spectators are permitted as described below).

All individuals entering the main building should follow the previously outlined requirements for individuals regarding self-checking for COVID-19 symptoms and following the respective policies put in place.

All individuals entering the main building shall be temperature checked.

All individuals entering the main building must practice social distancing and must wear face coverings at all times except where unsafe due to disability or medical condition.

Racing official office areas will be arranged to separate individuals as much as possible and, if necessary, physical barriers may be added. Racing office space use and configuration shall otherwise comply with the Sector Specific Workplace Safety Standards for Office Spaces to Address COVID-19 as issued by the Department of Labor Standards and all Minimum Requirements set by the Commission.

Individuals shall make efforts to keep their respective areas clean and sanitized.

At such time that spectators for outdoor viewing are permitted by Executive Order issued by the Governor as part of the Commonwealth's phased re-opening plan, the following limitations shall apply:

- Spectators may not gather in groups of more than six people
- The occupancy level in the outdoor apron area adjacent to the main building shall not exceed a count necessary to ensure that proper social distancing practices can be achieved.
- All spectators must wear face masks except where unsafe due to disability or medical condition
- Food or beverage service and consumption shall be restricted to designated areas, which shall be operated in accordance with Sector-Specific Workplace Safety Standards for restaurants.
- Bars shall remain closed until permitted to re-open by Executive Order issued by the Governor as part of Commonwealth's phased re-opening plan and until further MGC guidance
- Spectators shall not be allowed to carry or drink beverages while moving about the outside spectating area. Staff shall make reasonable efforts to ensure that guests comply with this rule.

The indoor areas, including the simulcasting area, at the gaming establishment shall be subject to the Minimum Requirements for the Initial Phase 3 Opening of Gaming Establishments and any superseding rules adopted by the Massachusetts Gaming Commission.

PPC/MGC shall take appropriate actions in the event of a positive test for COVID-19 by a horseman or PPC/MGC employee who was in the racing areas or in contact with individuals associated with the conduct of racing. These actions could include access restrictions for certain individuals for a certain period of time, additional cleaning requirements or cessation of racing for a period of time to take further appropriate measure to ensure the health and safety of all individuals. PPC will designate (and identify for the MGC) a Key-level employee to act as the Pandemic Safety Officer-a liaison to federal, state, and local public health agencies. This liaison

shall be responsible for notifying the local Board of Health, as well as the MGC, if there is a report of a COVID-19 positive case, and to assist with data sharing and identification of individuals for contact tracing purposes.



June 29, 2020

Dr. Alexandra Lightbown  
Director of Racing  
Massachusetts Gaming Commission  
101 Federal St, 12<sup>th</sup> Floor  
Boston, MA 02110

Dear Dr. Lightbown:

Per our most recent discussion and prior discussions with the Commission, we have revised the plan for our resumption of on-site simulcasting. We look forward to the Commission's meeting this Thursday and its continuing guidance as we work through the process.

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SSR intends to re-open on-site simulcasting operations in July consistent with guidelines issued by the CDC, the Massachusetts Department of Public Health, Governor Baker, the Executive Office of Housing and Economic Development, and the Commission designed to reduce the risk of COVID-19 transmission among employees and customers.

SSR is modifying its operations to adhere to recommended or required guidelines on social distancing, the wearing of masks that cover the nose and mouth, hygiene and sanitation, cleaning and disinfecting, staffing and operations, and communication and guidance to staff and customers. SSR will initially limit simulcast operations to the first floor of the clubhouse and the clubhouse apron while limiting occupancy to 50% of authorized capacity.

In addition, food and beverage service will be limited to outside on the clubhouse apron consistent with the public health guidelines issued for restaurants by the state and by the city of Boston. Guests will be served at tables spaced 6 feet apart or otherwise in accordance with the state guidelines and will not be allowed to carry food or beverages away from their individual tables in the designated dining areas. SSR will make reasonable efforts to ensure that customers do not violate this rule.

<https://www.mass.gov/doc/restaurants-checklist-english/download>



Later in the summer, depending upon demand and consistent with the state's phased re-opening guidelines, we plan to re-open the second floor of the clubhouse, and will update the commission on those plans as they move forward. For now, here are our plans for opening on or about July 11<sup>th</sup> complying with all public health guidelines issued by the CDC, DPH and the Governor.

### **Pre-Opening Cleaning**

- Complete cleaning and disinfecting of all areas open to the public and employees in accordance with CDC Guidelines for Cleaning and Disinfecting and best practices as indicated by the Governor

### **Ongoing Cleaning and Sanitation**

- Daily cleaning and disinfecting of all areas open to the public and to employees in accordance with CDC Guideline
- Sanitary wipes available to customers at self-betting terminals
- During hours of operation, regular cleaning of pari-mutuel wagering areas, self-betting terminals and other surfaces
- Hand sanitizer dispensers throughout clubhouse (wall-mounted and at pari-mutuel windows) All hand sanitizer throughout property shall comport with CDC Guidelines (minimum 60% ethanol or 70% isopropanol)
- Maintain handwashing capabilities throughout the facility
- Disposable gloves available for all mutual clerks, money room, security and maintenance personnel

### **Employee Training**

- Train employees on cleanliness and sanitation protocols, including safe money-handling
- Train employees on identifying symptomatic individuals and reporting to management for potential intervention and additional screening

### **Occupancy**

- Limit total occupancy to less than 50% (e.g., 1<sup>st</sup> floor Clubhouse occupancy is 600 not including the apron; will be limited to 250)

### **Entrance/Screening of Guests**

- Customer entrance restricted to main clubhouse entrance
- Separate entrance for employees
- At points of entry, signage and greeters will require guests to wear masks<sup>1</sup> that cover the nose and mouth while at the facility except while eating or drinking.

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<sup>1</sup> Note that the requirement for guests to wear masks will not apply to people with medical conditions or disabilities that preclude them from safely doing so

Eating and drinking will be restricted to specific outdoor areas on the clubhouse apron consistent with state and local public health requirements

- Provide hand sanitizer at points of entry and signage and greeters to require guests to use it before entering. All hand sanitizer throughout property shall comport with CDC Guidelines (minimum 60% ethanol or 70% isopropanol)

### **Social Distancing**

- Maintain separate entrance and exit areas
- Entrance through turnstiles only with customer service staff monitoring and advising guests of social distancing requirements
- Mutuel windows spaced more than six feet apart with plexiglass shields
- Self-bet terminals spaced more than six feet apart
- Program terminals spaced more than six feet apart
- Clearly defined and marked queuing areas with a minimum of six feet of spacing between those waiting

### **Pandemic Safety Advisor**

SSR has designated David Lanzilli, our Controller, to act as the Pandemic Safety Officer, to liaison to federal, state, and local public health agencies. This liaison shall be responsible for notifying the local Board of Health, as well as the MGC, if there is a report of a COVID-19 positive case, and to assist with data sharing and identification of individuals for contact tracing purposes.

### **Public Notices, Communication and Signage**

SSR shall develop and implement a communications plan to inform guests of its expectations regarding COVID-19. The communications plan, website, and signage at points of entry shall list COVID-19 symptoms and direct guests not to visit/enter if they indicate "YES" to feeling or exhibiting any symptoms. The communications plan, website, and signage also shall direct guests not to visit/enter if they have traveled to any CDC Level 3 Warning country in the past 14 days (list countries), or have come into close contact with an individual with a confirmed case of COVID-19 in the past 14 days, and shall further discourage people at increased risk for severe illness or who are generally feeling ill from entering the property. It will also include the following elements:

- Prominent display of signage and posters at entrance and throughout the open areas informing customers of safety protocols and requirements
- Update to the SSR web site ([suffolkdowns.com](http://suffolkdowns.com)) to prominently feature Covid 19 safety protocols
- Email messages to SSR database advising of re-opening and Covid 19 requirements for patrons
- Display of Executive Office of Housing and Economic Development Mandatory Safety Standards Posters in multiple languages

- Signage shall be placed in back-of-the house areas reminding employees to follow CDC and DPH guidelines for handwashing, using sanitizers, wearing masks, and staying home if sick.
- Break schedules and shift times shall be staggered to the extent possible to avoid congregating in back-of-the-house areas.
- Employee meetings conducted with social distancing protocols

As always, I am happy to answer any questions the Commission may have for us.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Chip Tuttle". The signature is fluid and cursive, with a prominent loop at the end of the last name.

Chip Tuttle  
COO

# RAYNHAM PARK

## REOPENING PLAN

This reopening plan details procedures that have or will be implemented, to ensure the safety of our employees and guests. Raynham Park will continue to monitor directives from federal, state, and local governments, and agencies, such as the Centers for Disease Control (CDC), and the Massachusetts Gaming Commission. We understand this is a fluid situation and will make changes, as necessary, to our protocols and procedures.

### EMPLOYEE AND GUEST SAFETY

*The health and safety of our employees and guests is our foremost priority. All employees and guests will enter and exit through one controlled and monitored set of doors. Social distancing markers and directional arrows will be placed throughout the property, to guide and separate all employees and guests.*

**Temperature Checks** – Upon arrival, all employees will have a temperature check, in a designated private area. Any employee displaying a temperature of 100.4°F or above will not be allowed to work. They will be directed to return home and contact their doctor or nearest medical facility.

**Physical Distancing** - All employees and guests will be advised to practice social distancing, keeping at least six feet away from others or others not in their group. Tables, chairs, walkways, betting stations, etc. have been arranged, to ensure appropriate distancing. Our facility will be significantly below the maximum permitted occupancy limit.

**Hand Sanitizer** - Additional hand sanitizer dispensers have been placed throughout the facility, including all high contact areas and the entrance and exit doors

**Signage** – Throughout the facility, signage will be displayed to remind guests and employees of safe practices, including: frequent and proper hand washing, use of hand sanitizer, proper wearing and disposal of masks and gloves, to stay home when feeling sick, to avoid touching the face, and how to sneeze to minimize droplet dispersal.

### EMPLOYEE RESPONSIBILITIES

**Hand Washing** - All employees will be instructed to properly wash their hands or use hand sanitizer (if a sink is not readily available) every hour and after any of the following activities: use of restrooms, sneezing and/or blowing nose, touching face, cleaning, sweeping, mopping, smoking, eating, drinking, before and after breaks, and before and after shifts.

**COVID-19 Training**

All employees will receive training on recognizing COVID-19 symptoms, best practices to prevent spread, and disinfection protocols. More specific training will be provided to our staff involved in food handling and preparation.

## PERSONAL PROTECTIVE EQUIPMENT (PPE)

*Appropriate receptacles, for disposal of PPE, will be provided.*

**Employee Protocols** - All employees will be required to wear a mask that covers the nose and mouth while on the property. Masks will be provided, for those who need one. Gloves will be available to all employees. Gloves will be required to be worn by employees whose responsibilities have been determined to require the wearing of gloves.

**Guest Protocols** - Guests will enter and exit the facility through one designated means. They will be offered hand sanitizer and be advised they must wear a mask covering the nose and mouth at all times, except when eating or drinking. While eating and drinking, they must be seated at a table.

## CLEANING PRODUCTS AND PROCEDURES

*Our facility will use cleaning products and protocols, which meet EPA guidelines for use against the COVID-19 virus and are effective against viruses, bacteria, and other airborne and blood borne pathogens. We are working with our vendors to ensure an uninterrupted supply of these cleaning products and PPE. A privately contracted cleaning company will be responsible for cleaning and disinfecting all bathrooms and high touch areas, before, during, and after business hours. Employees will sanitize point of sale screens and countertops every hour and tables and chairs, in between guests.*

**Preopening Cleaning** – Before reopening, full cleaning and disinfecting of the facility will be performed, in accordance with CDC “Guidelines for Cleaning and Disinfecting Your Facility” and any other sector specific protocols and best practices, as indicated by the Governor.

**Public Spaces and Communal Areas** - The frequency of cleaning and disinfecting will be increased, with an emphasis on high contact surfaces, in all public spaces and communal areas, including but not limited to: counters, program sales area, kitchen areas, offices, door handles, bathrooms, point of sale screens, ATM’s, stair and ramp handrails, lottery ticket machines, self-service betting machines, table surfaces, and seating areas. Disinfecting wipes (subject to availability) will be placed near high touch areas.

**Program Stand** - Countertops will be disinfected, at least once per hour.

**Concession Stand** - Countertops will be disinfected, at least once per hour. Point of sale terminals will be assigned to a single employee and disinfected before and after each shift. Utensils will be given by cashier or server. Condiments will be served in single use containers. Pens and other reusable guest contact items, will be disinfected after each use. Single use, disposable menus will be utilized. Food preparation stations will be disinfected every hour. Kitchens will be deep cleaned and disinfected each day.

**Pari-Mutuel Lines** – Countertops will be disinfected, at least once per hour. Terminals will be assigned to a single employee and disinfected before and after each shift.

## CLEANING PRODUCTS AND PROCEDURES (cont.)

**Money Room** - Countertops will be disinfected, at least once per hour. Cash counting machines will be assigned to a single employee and disinfected before and after each shift.

**Air Filter and HVAC Cleaning** - Air filter replacement and HVAC system cleaning are done on a regular basis. Fresh air exchange will be maximized, to the greatest extent possible.

## PHYSICAL DISTANCING

*Throughout the facility, we will meet or exceed state and local health authority guidelines, on proper physical distancing.*

**Queuing** – All areas where employees or guests queue have been clearly marked, at six foot intervals, for appropriate physical distancing. This includes: entry ways, ticket windows, and concession stand areas.

**Seating** – The facility has drastically reduced seating capacities, by reconfiguring tables, chairs, and stools, to allow for a minimum of six feet, between each seated group of guests. Groups will be limited to six people.

**Self-Service Machines** – The number of operating self-service betting machines, lottery ticket kiosks, vending machines, and ATM's have been reduced or relocated, to allow a physical separation, of at least six feet between guests.

**Program Stand** – There will be a maximum of two employees, seated at least six feet apart, stationed at the program stand. Plexiglas barriers will be installed to provide protection between employees and guests.

**Pari-mutuel /Lottery Windows** – Employees will be spaced a minimum of six feet apart. Plexiglas barriers have been installed, to provide protection between employees and guests.

**Concession Stand/Waitstaff** – Employees will have assigned point of sale terminals. There will be a maximum of two cashiers, behind concession counter. Cooks will have designated work areas, which will allow them to remain at least six feet apart. A glass barrier will be installed, to provide protection between concession stand employees and guests.

**Money Room** – Employees will have designated work areas, which will allow them to remain at least six feet apart. A Plexiglas barrier has been installed to provide protection between money room employees, in their workspaces, and where other employees retrieve and return money. Plexiglas barriers have been installed, on all cash counting machines, to decrease airflow and spread of contaminants, as cash is processed through the machines.

## FOOD AND BEVERAGE SERVICE

*Food and non-alcoholic beverage service will be allowed, in our second floor Clubhouse area, by waitress service or by self-service, at our concession stand. Alcoholic beverages will be available, by waitress service only and shall be limited to guests who are seated and who lower their masks for drinking and/or eating only. Guests shall not be allowed to carry or drink beverages, while moving about the simulcasting area. Staff will make reasonable efforts, to ensure that guests do not violate this rule.*

## COMMUNICATIONS PLAN

*Raynham Park will develop a communications plan, to inform guests of its expectations, regarding COVID- 19. The communications plan, website, and signage at points of entry shall list COVID-19 symptoms and direct guests not to visit/enter if they are exhibiting any of these symptoms. The communications plan, website, and signage shall also direct guests not to visit/enter if, in the past 14 days, they have traveled to any CDC Level 3 Warning Country, (list countries) or have come into close contact, with an individual with a confirmed case of COVID-19, and shall further discourage people, at increased risk for severe illness or who are generally feeling ill, from entering the property.*

**Pandemic Safety Officer** – A key-level employee will be designated (and identified for the MGC), to act as the Pandemic Safety Officer-a liaison to federal, state, and local public health agencies. This liaison shall be responsible for notifying the local Board of Health, as well as the MGC, if there is a report of a COVID-19 positive case, and to assist with data sharing and identification of individuals, for contact tracing purposes.