



Risk Consulting Alert

Reopening Considerations for Your Amusement Facility

This document highlights general guidelines to consider before reopening your amusement facility. Due to the COVID-19 pandemic, additional safety steps should be considered not only to help keep staff and customers safe and to comply with federal, state and local laws; but to help your facility maintain a positive reputation.

Due to the variances and unique features of each amusement facility, this list is not all inclusive. Consider how the suggestions may apply to your unique facility. All local, state and federal laws and guidance from organizations like the Centers for Disease Control and Prevention (CDC), the Americans with Disabilities Act (ADA), the Occupational Safety and Health Administration (OSHA), the Equal Employment Opportunity Commission (EEOC), the Environmental Protection Agency (EPA) and others should be considered when implementing new operational policies regarding COVID-19, particularly with respect to social distancing and disinfecting and sanitization. Check with industry trade groups or associations for additional considerations for your specific facility.

The information in this Alert may be used as a guide to create a pre-opening checklist to assist in documenting and tracking the completion of pre-opening activities.

Ticket Sales and Social Distancing

- Is there a limit on the number of people allowed to visit per day?
 - How is this determined?
 - Discuss how the attendance capacity will be restricted
 - Restrictions for total park/facility attendance; individual indoor vs. outdoor attractions, etc.
 - Use of Radio-frequency identification (RFID) wrist bands? Virtual queue lines? Crowd monitoring apps?

OFFICE LOCATION

Specialty Insurance Group

The Congressional Building
111 Congressional Blvd.
Suite 220
Carmel, IN 46032
Tel: (317) 853-7050
Tel: (855) 744-1113

CONTACT INFORMATION

Laure Preston, CHMM, ARM, CFPS

Director, Risk Consulting
Tel: (317) 998-1027
lpreston@specialtyinsurancegroup.com

Clay Barnes, ARM

Manager, Risk Consulting
Tel: (317) 998-0536
cbarnes@specialtyinsurancegroup.com

Specialty Insurance Group offers a host of valuable policyholder resources and services.

- Determine how social distancing and other concerns will be effectively communicated to your guests and throughout the facility. Possible methods include:
 - Signs
 - Website banners and alerts
 - A public address system with regular announcement reminders regarding social distancing, washing or sanitizing hands, only removing face covering to eat or drink (if applicable) or other concerns
 - Visual notification – ground markings, signs, etc.
 - Other means of notification
- Consider all social distancing aspects of your facility and how they differ (e.g., an amusement device with seats may have a different requirement than a concession center. Areas may include Amusement rides, ticketing areas, concessions, queue lines, emergency evacuation shelters (used for weather incidents and the like) or other areas of the facility
- Identify what type of notifications will be placed in each area: ground signs, seat signs, tape or other methods
- Daily sign checks added to your formal inspection checklists to verify they are not broken, missing, etc. and replacing as needed
- Discuss whether the facility will have a partial or soft opening
 - Identify which areas will be opened initially
 - Will there be a different timeline for outdoor vs. indoor attractions?
 - At what point will the entire facility be open?
 - Consider how off-limits or unopen areas will be monitored
 - Consider adjusting days and hours of operation to allow time for deep cleaning
- Consider how ticket sales will be limited to ensure social distancing capacity is not reached. Options may include online ticket sales only, customers reserving a slot or time frame, or consider how lines will be marked for social distancing if tickets can be purchased on site
- Discuss whether face coverings or other personal protective equipment (PPE) will be required of employees and/or guests
 - If so, how will this be communicated and enforced?
 - Decide how you will keep employees distanced from each other, and how will each employee be distanced from customers
 - Per OSHA, masks or other PPE determined for use by employees is the responsibility of the employer
 - Consider how you will mandate employee handwashing or sanitizing
 - Outline the frequency of handwashing – after using the restroom, after sneezing or coughing, before changing job tasks, etc.
 - Outline the frequency of glove changes for each job task
- Determine what payment methods will be accepted and how employees and guests will be best protected
 - Cash handling considerations
 - Consider whether credit cards will be the only accepted method of payment

- If so, who touches the card – only the customer? The employee?
- Discuss if employees will be designated specifically for each payment method
 - Cash only lines vs. credit card only lines
 - Employees who accept payment may be required to wash hands and change gloves before changing job duties
- Consider how consistent procedures will be maintained throughout the facility
 - Supervisory staff?
 - Internal audits?
- Determine what additions may be needed to the staff

Operational and Employee Training Considerations

- Employee pool
 - Determine how many former employees will return to work
 - How many new employees will be needed and what will the job hiring and training process look like?
 - United States citizens or a sponsored work travel program?
 - Consider additional regulations around J1 Visa work program/foreign workers
- Discuss how employees will be trained on reducing the spread of COVID-19
 - Stay at home when sick; avoid touching face, shaking hands, etc.
 - Consider how employees will be screened before starting each shift
 - Defer to the CDC and your legal counsel for guidance on all of the following:
 - Temperature checks
 - Consider the facility location: thermometer temperatures may not be correct in hot weather locations or areas
 - Basic health questions to ask (consider privacy and HIPPA)
 - Procedures for sending a sick employee home mid-shift
 - Consider any new ADA, EEOC or OSHA requirements regarding health and employment screening
- Determine how cleaning practices will be communicated to the guests by the employees
- When educating employees on COVID-19 signs, systems, and protective measures:
 - Refer to the OSHA Publication 3990-03 2020: Guidance on Preparing Workplaces for COVID-19, the CDC Interim Guidance for Businesses and Employers to Plan and Respond to COVID-19 and consider additional federal, state and local requirements
- Conduct and document risk assessments for specific positions that are often overlooked, including:
 - Cashiers and cash controls
 - Front gate and turnstile employees
 - Kitchen, cooking and bar staff

© 2020 Specialty Insurance Group, a division of Everest Insurance®

- Janitorial – sample risk assessment templates may be found on the internet
- Review how best to handle guest situations or complaints related to COVID-19
 - Draft a written policy on how guest concerns will be addressed
 - Who will address the concerns (i.e. Supervisors, Duty Managers etc.)
 - Discuss what steps or procedures should be in place
 - Consider how customer concerns will be documented
 - Allow your legal counsel to review before implementing
- Look to schedule an employee training and safety refresher training before re-opening, which may include:
 - Comprehensive and documented hazard communications plan, including:
 - Who should attend the training?
 - Who will conduct the training?
 - What will the training cover? This may include all chemicals and PPE that will be used, where each are stored, policy on PPE re-use, completion of sanitization logbook(s), etc.
 - When and how training will be conducted taking social distancing into consideration. Establish if training will be in-person or online
 - Review all Safety Data Sheets (SDS)
 - Review container labeling requirements
 - Ensure hazard communication training for proper use of any household consumer products (e.g. Window Cleaner, Bleach. Check the label on household consumer chemicals that are not supplied by a vendor for information regarding the proper PPE use that should be followed)
 - Sample HAZCOM plans can be found on OSHA, as well as various state and local websites
- Sanitizing and cleaning considerations
 - Determine if the sanitizers used are effective at killing the novel coronavirus
 - Use products approved by the EPA for use against the novel coronavirus
 - Follow the manufacturer's instructions for all cleaning and disinfection products
 - Establish how employees will be trained to follow the chemical manufacturer recommendations regarding use, separation, storage, application, dwell time, concentrate dilution and safety
 - Review the frequency of surface wipe-downs and a scheduled "route" to do so
 - Consider which surfaces require frequent wipe-downs and the route or method this will be accomplished
 - Determine the frequency – once per hour, throughout the day, or based on number of guests in the facility
 - Discuss how facility wipe-downs will be documented
 - Consider a Sanitizing and Wipe Down Log (similar to a sweep or restroom log) including a list of all areas that must be wiped down, date and time of the wipe down, employee initials, chemical or product(s) used for the wipe down, and dwell time

- Ensure the wipe-downs are conducted according to policy and under the responsibility of each Supervisor in that section. Address whether spot checks were performed, one employee will wipe down all areas of the facility, employees will be rotated on this task, and consider how long the wipe down should take, and how many staff additions may be needed to accomplish this
- Determine if all chemicals, cleaners and sanitizers used in your facility are compatible with each other
 - If not, how will they be segregated and stored?
 - Determine if alternative, effective options are available to ensure all chemicals are compatible
- Review how all safety training will be documented and update HAZCOM program as needed
- Determine if all chemicals and cleaners used are compatible and safe to use on the equipment or item being cleaned (e.g., suitable for use on plastic, rubber, metal; safe to use outside in UV light if applicable, etc.)
- Ensure the proper containment, storage and segregation and labeling for all chemicals per the manufacturer's requirement
 - Do not place a chemical (liquid or dry) into a container that is not approved by the manufacturer
 - Consider temperature, humidity or other requirements for storage
 - Properly label secondary containers (spray bottles, etc.)
- Ensure concentrates are diluted properly per manufacturer requirements to maintain effectiveness. Consider having:
 - Automatic dilution stations
 - Manual dilution instructions posted and employees trained on the proper procedures
- For handwashing and sanitizer stations:
 - Check the numbers, locations, stocking and types with consideration to:
 - How many additional stations needed
 - The location where the stations will be placed
 - The location where handwashing or sanitizing signs will be placed
 - The type(s) of soap and sanitizer to be used
 - Soap/ sanitizer should be antimicrobial (gel, liquid, foam and/ or wipes)
 - Critical considerations when locating sanitizers include all 'touch point' areas such as entrance and exit doors, restrooms (including doors), concessions or food service areas, tables and seating areas, ADA ramps, etc., and ride and attraction entrances and exits
 - Ensure clearly labeled "handwashing" and "sanitizer station" signs are placed throughout the facility
- For facilities that conduct bag checks, some employee safety considerations may include:
 - Appropriate personal protective equipment (PPE), such as gloves, masks, barriers between employees and customers, and wands or other methods to probe bags to avoid using hands
 - Customers should handle or move belongings in bags

- Consider conducting a 'safe glove use practices' training refresher to review:
 - Proper donning and discarding processes
 - When and how often gloves should be replaced
 - Proper glove and PPE disposal practices
 - Glove types, compatibility for a specific use and location(s) to access additional gloves and other PPE. Consider specific user allergies to latex
- Review the proper cleaning and flushing emergency eye wash and shower stations protocol for stagnant water

Rides and Attraction

- Determine how ride safety restraints will be verified to be locked in place (historically attendants may touch the restraint to verify it is locked). Possible procedures may include:
 - Riders manipulating the restraints in the manner the employee typically does while employee observes
 - Attendants continuing to conduct safety restraint checks as usual
 - Requiring glove use
 - Employees refraining from offering to assist when possible
 - Ask parent or guardian to assist with kiddie rides
- Discuss prohibiting riders from choosing their seats
 - Determine how to implement staggered seating
 - Check with your legal team on the appropriate questions and phrases to potentially ask guests, such as "Do you live in the same household?"
- Review the documented employee training on all new operational enhancements
- Ensure that the checklists are updated
- Consider having your operational audits include the observation of sanitization and social distancing practices
- Discuss the most frequently held and touched components of rides, attractions and access points for sanitizing
 - Which components per ride or attraction?
 - How often are they sanitized? (e.g. after each ride cycle? Hourly? Daily?)
- Social distancing practices/notification in queue lines
- Conduct a risk assessment for each ride or attraction; example risk assessments below such as:
 - Go-karts: properly sanitizing each machine and adjusting and securing seatbelts
 - Mini Golf: sanitizing clubs and balls before and after each use as a standard cleaning protocol
 - Bowling: sanitizing all balls, ball returns, scoring touchpad screens, seating areas, etc.

Building, Restrooms and Concessions

- Consider the building engineering controls for ventilation that could be improved (e.g., increasing the ventilation rates for the HVAC system)

Risk Consulting Alert



- Contact a ventilation or building engineer professional for guidance
- Consider providing signs advising proper hand washing techniques in each restroom
- Determine the best strategy to enact and post a sweep log program, with consideration to:
 - The frequency each area is cleaned
 - Each sanitizer or disinfectant used
 - The surfaces to be sanitized or cleaned, including:
 - Counters, paper towel dispensers, toilet paper dispensers, toilet and urinal flush handles, stall locking mechanisms and sink faucet knobs
- Consider installing hands-free door opening and closing methods or devices
- Ensure that anti-microbial soap is provided for guests and employees
- For stagnant water considerations, thoroughly examine, flush, or sanitize:
 - Water fountains, showers, soft drink fountain water lines or filters and ice machines
- Properly test and document the dish washing water temperatures and sanitizer levels

Additional Resources:

OSHA <https://www.osha.gov/SLTC/covid-19/>

CDC <https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-response.html>

EPA <https://www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2>

To Learn More:

Contact Everest's Risk Consulting Department at (800) 269-6660 or losscontrol@everestre.com for additional information.

Remember, the Specialty Insurance Group offers services to help you in your loss prevention efforts. If you would like more information about these services, visit our website at www.specialtyinsurancegroup.com.

Loss Control is a daily responsibility of your individual management. This publication is not a substitute for your own loss control program. The information contained in this document including claim information, best practices, and recommendations has been compiled from sources believed to be reliable and is intended to be descriptive and for general informational purposes only. This document should not be considered as all encompassing, or suitable for all situations, conditions, or environments. Each organization is responsible for implementing their own safety, injury, and illness prevention program and should consult with legal, medical, technical, or other advisors to reaffirm the information contained in this Alert. The information contained in this publication is intended for general informational purposes only and is not intended to constitute legal advice or opinions. You should contact an attorney if you need legal advice or if you have any questions concerning your obligations under any law, statute or code identified in this publication.

© 2020 Specialty Insurance Group, a division of Everest Insurance®

specialtyinsurancegroup.com

