

COVID-19 Preparedness Plan Guidance: Requirements for Indoor Venues

05/17/2021

This guidance applies to all business and places of public accommodation (“businesses”) – as defined by Executive Orders 21-11 as amended by EO 21-21 and EO 21-23 (“EO”) – operating indoor event and entertainment venues. This guidance applies from Friday, May 7, 2021, at 12 p.m. (noon) through May 27, 2021. Businesses must continue to follow all other applicable Stay Safe Industry Guidance found on the [Stay Safe Guidance website \(staysafe.mn.gov/industry-guidance/index.jsp\)](https://staysafe.mn.gov/industry-guidance/index.jsp). The EO requires all businesses to have and implement a written COVID-19 Preparedness Plan that addresses EO requirements and applicable Stay Safe Industry Guidance. For more information about Plan requirements, refer to the applicable [Stay Safe Guidance for All Business Entities webpage \(staysafe.mn.gov/industry-guidance/all-businesses.jsp\)](https://staysafe.mn.gov/industry-guidance/all-businesses.jsp).

This guidance has been updated to align with EO 21-11, 21-21, and 21-23, a CDC transmission of COVID-19 update (05/13/2021 update), and removal of face covering EO requirements (05/14/2021).

Recommendations to prevent the spread of COVID-19

COVID-19 spreads when an infected person breathes out droplets and very small particles that contain the virus. These droplets and particles can be breathed in by other people; land in their eyes, nose, or mouth; or land on surfaces that people touch. The risk of COVID-19 transmission increases when people gather with other households. Several key strategies can reduce the risk of getting sick or transmitting COVID-19:

- ✓ Get vaccinated. Vaccination is one of the best things you can do to prevent getting or spreading COVID-19. Visit [COVID-19 Vaccine \(www.health.state.mn.us/diseases/coronavirus/vaccine/index.html\)](https://www.health.state.mn.us/diseases/coronavirus/vaccine/index.html).
- ✓ Wear a face covering when recommended by MDH or CDC.
 - There is no longer a statewide requirement to wear face coverings in most settings. However, other federal, state, and/or local laws may require face coverings in some settings, and

businesses may set their own requirements. Additionally, Minnesota’s Safe Learning Plan, along with the existing face covering guidance for schools and childcare settings, remains in effect.

- For more information about face covering recommendations, refer to [MDH Face Covering Requirements and Recommendations](https://www.health.state.mn.us/diseases/coronavirus/facecover.html) (<https://www.health.state.mn.us/diseases/coronavirus/facecover.html>) and [MDH Frequently Asked Questions About Wearing Face Coverings](https://www.health.state.mn.us/diseases/coronavirus/facecoverfaq.html) (<https://www.health.state.mn.us/diseases/coronavirus/facecoverfaq.html>).
- ✓ If you are not vaccinated:
- Keep at least 6 feet of physical distance from other households and follow the face covering recommendations in the above MDH resources.
- ✓ Vaccinated or not vaccinated, MDH strongly recommends that everyone:
- Wash their hands often.
 - Follow guidance on staying home (quarantine) if you were exposed to someone who has COVID-19. People who are fully vaccinated may not need to quarantine in many situations. Visit [Quarantine Guidance for COVID-19 \(PDF\)](https://www.health.state.mn.us/diseases/coronavirus/quarguide.pdf) (www.health.state.mn.us/diseases/coronavirus/quarguide.pdf) for more details.
 - Stay home if they are sick. Visit [If You Are Sick: COVID-19](https://www.health.state.mn.us/diseases/coronavirus/sick.html) (www.health.state.mn.us/diseases/coronavirus/sick.html).
 - Follow testing recommendations for when they travel, have COVID-19 symptoms, or are exposed to COVID-19. Visit [COVID-19 Testing](https://www.health.state.mn.us/diseases/coronavirus/testsites/index.html) (www.health.state.mn.us/diseases/coronavirus/testsites/index.html) for information about who should get tested and how to get a test.
 - Work from home if possible. Employers must provide reasonable accommodations as required under existing federal and state law. Employers are strongly encouraged to provide reasonable accommodations to employees with one or more members of their household who have underlying medical conditions and who are unable to be vaccinated.

Definitions

Indoors

A space is “indoors” if the space is:

- Between the ground or other natural surface or a floor or similar surface and an overhead barrier, including but not limited to: a canopy, cap, awning, ceiling, roof, retractable barrier, or similar structure, whether opened or closed, and
- Bounded by a physical barrier, including but not limited to walls, partitions, retractable dividers, doorways, garage doors or windows, whether opened or closed, that cover more than 50% of the combined surface area of the vertical planes constituting the perimeter of the space.

Indoor spaces may be temporary or permanent, finished or unfinished. A physical barrier bounding a space may be made of natural and manufactured materials. A 0.011 gauge window screen with an 18 by

16 mesh count is not a barrier. Examples of spaces that are or can be indoor spaces include, but are not limited to, buildings, towers, stadiums, arenas, theaters, rotundas, domes, tents, pavilions, gazebos, igloos, trailers, and other enclosures.

Venue

A “venue” is a physical space or area used to perform activities or conduct events. A venue may be space or area that is public or private, indoors or outdoors, with defined or undefined perimeters and accessible with or without a cost to an attendee. A physical space or area is a venue if the actions, conduct, or decisions of a business or other entity, including an event organizer, result in members of the public assembling or gathering in a space or area for a common or collective activity or event.

Seated Venue

For the purposes of these requirements, a “seated venue” is a venue within which every patron in attendance maintains an individually allocated, reserved, or assigned seat or similar accommodation, which is located at a designated location and fixed space within the venue. Patrons at seated venues must remain seated throughout their attendance at the venue, except when entering and exiting, using the restroom, or purchasing merchandise or concessions.

Required Plan Sections

Follow the requirements in the applicable [Stay Safe Guidance for All Business Entities \(staysafe.mn.gov/industry-guidance/all-businesses.jsp\)](https://staysafe.mn.gov/industry-guidance/all-businesses.jsp) and the following:

1. [Health screening, isolation, and quarantine](#)
2. [Managing occupancy](#)
3. [Access, arrival, and checkpoints](#)
4. [Seating and assignment for indoor venues](#)
5. [Maintain social distancing between people](#)
6. [Hand hygiene practices](#)
7. [Cleaning and disinfecting](#)
8. [Food service, concessions, and merchandising](#)
9. [Live entertainment](#)

Requirements and Recommendations

1. Health screening, isolation, and quarantine

Requirements

- Follow the health screening, isolation, and quarantine requirements in the applicable [Stay Safe Guidance for All Business Entities \(staysafe.mn.gov/industry-guidance/all-businesses.jsp\)](https://staysafe.mn.gov/industry-guidance/all-businesses.jsp).

Recommendations

- Have patrons review and respond to health-screening-survey questions before arriving (e.g., through email or text) or immediately upon arrival and check-in.
- Establish a process for providing refunds for patrons who are not able to attend due to answers provided to health screening questions.

2. Managing occupancy

A Venue Occupancy Calculator and a COVID-19 Venue Capacity Guide are tools available to determine occupant capacity on the [Stay Safe Guidance for Entertainment and Meeting Venues webpage \(staysafe.mn.gov/industry-guidance/entertainment.jsp\)](https://staysafe.mn.gov/industry-guidance/entertainment.jsp).

Requirements

Determining Occupant Capacity: Unless otherwise expressly permitted under these requirements, indoor venues must reduce the occupant capacity for the entire venue to that which is necessary to meet the social distancing requirements in this guidance at all times.

- To calculate the permitted maximum occupant capacity for the venue, venues must begin with the normal occupant capacity of the venue whenever required or established by applicable state or local authorities in accordance with established codes and requirements. A business may not use other metrics (e.g. ticket-sales, previous year’s attendance) as a basis for determining capacity unless expressly provided within this document. If a business is unsure of its occupant capacity, the business must consult with the applicable state or local authorities with jurisdiction.
- **Workers and Performers:** Subject to the requirements in this paragraph, workers do not need to be counted toward venue occupancy. In addition, performers do not need to be counted as occupants if the venue implements the separation measures in the “Live Entertainment” section below. However, if the spaces accessible only by performers or workers only (e.g., kitchens, offices, locker rooms, fields, stages, etc.) are also part of the space used to calculate rated occupant capacity, the venue must either reduce the rated occupant capacity to exclude worker- or performer-only space before calculating maximum occupancy under this section, or must include performers and workers as “occupants” of the venue.
- **Parents/Guardians of Minors:** If a patron is a minor that requires supervision, the minor and the parent or guardian are each counted as individual occupants.
- **Bleacher Capacity:** The identified seating capacity for bleachers or bench-style seating cannot be used to determine occupant capacity for a venue.

Indoor Non-Seated Venues: Occupancy for indoor non-seated venues cannot exceed the maximum number of persons as determined by the following:

- **Less than 500 persons:** If the rated occupant capacity of an entire indoor non-seated venue is 500 persons or less, then the occupancy for the entire venue cannot exceed **50%** of the rated occupant capacity or **250** people at any time, whichever is less.

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- **Greater than 500 persons:** If the rated occupant capacity of the entire indoor non-seated venue is greater than 500 persons, then business must use the following calculation to determine the maximum occupancy for the entire venue:
 - Step 1: Start with the rated occupant capacity for the entire venue and **subtract 500**.
 - Step 2: Take the difference and **multiply it by 15% (0.15)**.
 - Step 3: Take the number and **add 250**.
 - The resulting calculation is the maximum number of persons allowed within the indoor spaces of the venue at any given time.
 - EXAMPLE: An indoor recreation center maintains an occupant capacity of 2,500 patrons. The maximum capacity permitted is 550.
 - $2,500 - 500 = 2,000$;
 - $2,000 \times 0.15 = 300$;
 - $300 + 250 = 550$.

Indoor Seated Venues: The below requirements establish maximum occupancy in a “seated venue” only, and such venues must effectively implement the requirements set forth in the “Seating and Assignment” section below. Occupancy for indoor seated venues cannot exceed the maximum number of persons as determined by the following:

- **Less than 500 persons:** If the rated occupant capacity of an entire indoor seated venue is 500 persons or less, then the occupancy for an indoor seated venue cannot exceed **50%** of the rated occupant capacity or **250** people at any time, whichever is less.
- **Greater than 500 persons:** If the rated occupant capacity of the entire indoor seated venue is greater than 500 persons, then businesses must use the following calculation to determine the maximum occupancy for the entire venue:
 - Step 1: Start with the rated occupant capacity for the entire venue and **subtract 500**.
 - Step 2: Take the difference and **multiply it by 25% (0.25)**.
 - Step 3: Take the number and **add 250**.
 - The resulting calculation is the maximum number of persons allowed within the indoor spaces of the venue at any given time.
 - EXAMPLE: An indoor theater maintains an occupant capacity of 2,500 patrons. The maximum capacity permitted is 750.
 - $2,500 - 500 = 2,000$;
 - $2,000 \times 0.25 = 500$
 - $500 + 250 = 750$.

Indoor Venues with No Occupant Capacity: If an indoor venue does not maintain an occupant capacity that is required or established by applicable state or local authorities (e.g., warehouse, indoor field), the venue must use the following calculation to determine the maximum occupancy allowed for the venue:

- Step 1: Determine the total area (in square-feet) of indoor space within the venue that is accessible to, and may be occupied by, patrons while at the venue/event.

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- Step 2: Ensure all areas that are not accessible to patrons, including “worker only” and “performer only” areas (e.g., restricted areas, playing fields, stages, exhibits, animal habitats, kitchens, janitorial areas) are not included in the total area occupied by patrons.
- Step 3: Divide the area by 113 (i.e., 113 square-feet per person). Refer to [US Fire Administration’s Understanding the Impact of Social Distancing on Occupancy \(www.usfa.fema.gov/coronavirus/planning_response/occupancy_social_distancing.html\)](https://www.usfa.fema.gov/coronavirus/planning_response/occupancy_social_distancing.html).
- The resulting calculation is the maximum number of people allowed for the indoor space. Venues with Indoor and Outdoor Spaces.

Maximum occupancy limits: If a venue has both indoor and outdoor spaces, the capacity for each of the venue’s indoor spaces is limited to the maximum occupancy limits applicable to the indoor space as calculated above, regardless of the number of patrons allowed within the venue’s outdoor space. A venue may not combine its indoor and outdoor maximum occupancy limits.

- **EXAMPLE:** A zoo has a large outdoor exhibit area with a rated occupant capacity of 25,000 people and an indoor exhibit area with a rated occupant capacity of 8,000 people. The zoo offers seating areas at some exhibits and for consuming concessions, but attendees generally walk from exhibit to exhibit. These requirements do not limit the maximum occupancy of the outdoor space, but the maximum occupancy limit for the indoor space is 1,375 patrons.
 - $8,000 - 500 = 7,500$;
 - $7,500 \times 0.15 = 1,125$;
 - $1,125 + 250 = \mathbf{1,375}$.

Social Distancing Must Be Maintained Indoors: Under all circumstances indoors, if the allowable number of patrons creates congregation, congestion and bottlenecking that does not allow for proper social distancing and consistency with these requirements, the venue must further reduce the number of patrons it allows to a level that achieves consistency with these requirements.

Communication of Capacity: Venues must ensure the maximum number of patrons allowed within the venue (as determined by the above requirements) is expressly stated in the written COVID-19 Preparedness Plan for the venue. The COVID-19 Preparedness Plan must also include all rated occupant capacities, social distancing calculations, and other factors used to derive the capacity used by the venue.

3. Access, arrival, and checkpoints

Requirements

Managing Access: Businesses must monitor and manage access and occupancy of indoor venues to ensure the maximum occupant capacity is not exceeded.

- Control access into indoor venues to limit the number of patrons allowed within each indoor venue at one time, and do not exceed the required percentage of occupant capacity allowed at any given time where required.

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- Indoor venues must ensure perimeters or boundaries are established by means that will allow for access into the venue to be effectively controlled. Indoor venues must ensure the system used prevents uncontrolled access to the venue. Thus, although stanchions or a rope-line may be used, a venue will need to establish a system of higher integrity if the rope-line is insufficient for preventing unauthorized persons from entering the venue. Indoor venues may rely on the confines of the building or structure for activities occurring indoors so long as access into the venue is controlled at entry points.
- Limit access into the indoor spaces of the venue to only patrons with tickets or reservations, workers, and performers. If an indoor venue allows “walk-up” sales or admittance, the venue must ensure that the social distancing and other relevant requirements are followed in any lines or waiting areas, and that “walk-up” patrons do not enter a venue that is at maximum occupancy.
- Performers for indoor venues must use entrances and exits that are separate from those used by patrons.

Managing Arrival: Businesses must manage arrival of patrons to indoor venues to ensure social distancing of at least 6 feet is maintained between groups of patrons (as defined in the social distancing requirements in section 5, below) at all times.

- Establish staggered admission-times to minimize overlap and congregating of patrons at chokepoints (e.g., access points, security checkpoints, admission areas, concession areas). Consider prescheduling individually assigned arrival times (e.g., seating furthest from entrances permitted to enter earlier).
- For venues hosting multiple events, stagger event times to minimize patrons from different events arriving and congregating with one another.
- Ensure adequate distance is established between checkpoints (e.g., ticketing, security, medical screening) to guarantee proper social distancing between patrons, and minimize congestion of patrons waiting to enter the venue.
- Assign a number of ushers, monitors, and/or security personnel necessary to facilitate orderly screening and entry into the venue, and to effectively monitor and maintain social distancing throughout the process.

Recommendations

- Schedule arrival times for longer than their typical duration to minimize the congregation of patrons waiting.
- Establish “drop off” areas to allow for patrons within groups of up to 10 to be dropped off at their designated entrance to the venue to minimize the number of persons walking through parking ramps, parking areas, sidewalks, and walk-ways.
- Enhance security protocols for entry to allow for more efficient security-checks of patrons, minimize face-to-face interaction between security personnel and patrons, and minimize wait-times (e.g. metal-detectors, scanners, transparent baggies for personal items, limit pat-down checks).

4. Seating and assignment for indoor venues

Requirements

Indoor seated venues must ensure that every patron maintains an individually allocated, reserved, or assigned seat or similar accommodation, which is located at a designated location and fixed space within the venue.

- Patrons must remain seated in their designated seat throughout their attendance at an indoor seated venue (unless entering or exiting, or briefly leaving their assigned seat to access restroom facilities, obtain concessions, or purchase merchandise).
- Ensure social distancing of at least 6-feet is maintained between all patrons from different groups (defined in the social distancing requirements in section 5, below). Only persons from the same group may be seated directly next to one-another where social distancing of at least 6-feet is not maintained.
- Assigned seats must be identified by marking, labeling, or taping seating or tabletop areas, or identifying seat assignments.
- Identify seating areas used by groups to maintain physical distancing of at least 6-feet at all times between members of different groups.
- Provide staggered seating to ensure proper social distancing and ensure patrons or groups are not seated directly next to, in front of or behind other patrons or groups.
- Assign ushers, monitors, or security personnel necessary to facilitate orderly entry, navigation, seating, unseating, and exit throughout the venue, and to effectively monitor and maintain social distancing throughout the venue.

5. Maintain social distance between people

Requirements

- Patrons may attend an indoor event with a group and are not required to maintain social distancing from other group members, **provided that the group does not exceed 10 people**.
- Social distancing of at least 6-feet must be maintained between all groups while in attendance at indoor venues.
- Members of each group of patrons must not co-mingle with other groups of patrons at indoor venues if social distancing cannot be maintained between members of different groups.
- Eliminate congestion areas, bottlenecks and choke points within indoor venues, and provide queuing (e.g. signage, markings, barriers, paint, tape, flags) to maintain social distancing.
- Patrons within indoor venues must not be allowed to linger or socialize in lobbies, common areas, hallways, restrooms, ticket- counters, concession-counters, etc.
- Ensure indoor attractions (e.g., displays, iconic memorabilia) are arranged to provide for social distancing of at least 6-feet according to this section. Prohibit the congregation of persons around individual attractions located indoors.
- Implement and maintain social distancing in specific spaces or while performing certain activities

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- Indoor presentation ceremonies of items such as certificates, trophies, awards, ribbons, badges, pins, and decorations must ensure social distancing to the extent possible. However, notwithstanding the social distancing requirements in this guidance, presenters may move closer than six feet to present these items to a recipient. This closer contact must be limited to the briefest period of time possible.
- Meet-and-Greets: Any “meet and greet” events with performers occurring indoors must meet the specific social distancing and patron/performer separation requirements discussed in the “Live Entertainment” section below.

Recommendation

- It is important to note that close contact with members of other households greatly increases the risk of transmission. Even though groups of up to 10 are permitted by this guidance, patrons should still be strongly encouraged to maintain social distance from members of other households.
- Establish social distancing of at least 6 feet between all persons outdoors throughout the venue.
- Designate one-way traffic-flows to mitigate congestion and crowding.
- When groups of patrons are leaving, unseat patrons in an orderly fashion, starting with those closest to the exit and ending with those farthest from the exit.
- Provide additional gender-neutral stalls, privies, or toilet units to minimize traffic and congestion. Provide additional handwashing facilities and hand sanitizer facilities to minimize congestion.
- Meetings. Businesses are strongly encouraged to hold meetings or trainings virtually whenever possible. In-person meetings and training sessions should be limited to as few workers as possible. Businesses are strongly encouraged to allow workers to attend meetings from home whenever possible.

6. Hand hygiene practices

Recommendations

- Provide additional hand-washing stations and sanitizer throughout the venue for patrons to encourage hand washing and minimize crowding, congestion, and lines.

7. Cleaning and disinfecting

Requirements

- Remove “self-service” stations for patrons to obtain equipment (e.g. golf-clubs, skates), and require that rental and provided equipment be individually and directly issued to each patron or group. Ensure equipment is returned directly to a designated area to minimize the equipment being exchanged directly between patrons.
- Ensure instrumentation, products, samples, and props are sanitized prior to use and in between handling by workers and patrons.

- Ensure high touch surfaces (e.g. seats, armrests, cup holders, tables, door handles, ticketing kiosks, touch screens) are being disinfected during timed intervals and between venues and events.

8. Food service, concessions, and merchandizing

Requirements

- Ensure multiple ticket-counters, merchandise-counters, concession-counters, and drink-dispensers are separated to allow patrons to maintain a social distance of at least 6 feet in accordance with this guidance.
- Ensure social queuing is established to provide and promote social distancing between multiple workers and patrons waiting in lines to make purchases or pick up orders. Lane-lines, order, check-out, and adjacent areas must be demarcated (e.g. floor markers, stanchions) to provide for social distancing of at least 6-feet.
- Food Service: Refer to Industry Guidance for Safely Reopening: Restaurants & Bars on the [Stay Safe Guidance for Restaurants and Bars \(staysafe.mn.gov/industry-guidance/restaurants-bars.jsp\)](https://staysafe.mn.gov/industry-guidance/restaurants-bars.jsp) .
- Patrons within indoor venues must take food and beverages back to their individually assigned seating areas or areas designated for the consumption of food and beverages. When indoors, patrons may only consume food and beverages while seated in their individually assigned seating area or designated areas.

Recommendations

- Use app-based ordering to minimize patrons having to wait in line, linger and congregate in concession and merchandise areas.
- Consider delivering concessions directly to designated seating areas, as opposed to providing concessions at concession stands, provided that workers can be protected.
- Limit menu items to those items that can be readily retrieved and/or quickly prepared to minimize congestion, lingering, and waiting. Consider “pre- assembled” order-groupings or orders to simplify ordering and minimize ordering and wait-times.

9. Live entertainment

Requirements

- Indoor live entertainment is only permitted by performers who are designated by the venue. Examples include, but are not limited to, live music, concerts, stage performances, athletic events, contests, and combative sports.
- Indoor karaoke singing and open microphone events involving performances by patrons and visitors are strongly discouraged. However, where karaoke is performed indoors, patrons performing must maintain a distance of at least 12-feet from all other people while performing.
- Indoor venues operating under this guidance may not permit patrons to dance unless physical distancing of at least 6-feet is maintained at all times between all persons of different groups.

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- When hosting “live” events and performances indoors, separation of at least 12-feet must be maintained at between the “performers” and “patrons.”
- When hosting “live” events and performances indoors, the venue must ensure that a designated performance area is established (e.g., stage, court, field, ringside, aisle), and that the performance area is separate and distinct from those areas accessible to patrons.
- A physical distance of at least 12-feet horizontally must be maintained indoors at all times between the performers and performance area, and those areas accessible to the patrons (e.g., seating area, concession areas, and audience). Install barriers or partitions to maintain the 12-foot separation between the indoor performance area and patron areas.
- When indoors, performers must remain within the designated performance area, and performers are not permitted to leave the designated performance area and enter into areas accessible by patrons, or intermingle, co-mingle, or congregate within 12-feet of patrons.
- Performance-related demonstrations, exercises, and activities that involve interaction between performers and patrons that conflict with these social-distancing practices are not permitted indoors.

