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September 21, 2020

Sandra Cashman,
Executive Secretary, Centers for Disease Control and Prevention
Response to Centers for Disease Control RFI on Cruise Ship Planning
CDC-2020-0087-0001

On behalf of the Alaska Travel Industry Association (ATIA), the leading statewide trade association for travel and tourism businesses in Alaska, we would like to submit the following comments to the Centers for Disease Control on measures to support future travel on cruise ships.

Tourism is a multi-billion-dollar industry in Alaska, generating \$4.5 billion in total economic impact for our state in 2018 alone. Tourism is also the state's second-largest private sector employer, supporting 1 in 10 jobs.

As an industry supported almost exclusively by out-of-state and international visitors, we are highly susceptible to national and international affairs. In 2019, approximately 60% of our visitors travelled by cruise ship. Those visitors stayed in hotels, attended local events, took excursions, explored public lands, and paid taxes and fees to our state and our communities.

In 2020, 99% of scheduled cruises to Alaska cancelled their itineraries as a result of COVID-19 and the CDC's No Sail Order. Without the cruise industry, businesses across Alaska face critical economic and financial decisions. If the No Sale Order continues into the 2021 season, Alaska's already fragile tourism industry, dominated by small businesses, will face near economic ruin.

The Alaska tourism community is committed to the health and safety of our teams, families, communities and guests, and we want to support efforts by the CDC and the cruise industry to restore operations. We know it takes a commitment from guests and operators together to help stop the spread of COVID-19.

In response to CDC's specific questions, ATIA -on behalf of our more than 630 members – provides the following response based on our [industry protocols and guidelines document](#).

Planning and Infrastructure

Question 1. Given the challenges of eliminating COVID-19 on board cruise ships while operating with reduced crew on board during the period of the April 15, 2020 No Sail Order Extension, what methods, strategies, and practices should cruise ship operators implement to prevent COVID-19 transmission when operating with passengers?

The cruise industry's previously established health and cleaning standards will help prevent on-board disease transmission. However, until such time as a vaccine is developed and fast-track testing is available, cruise ships should also implement measures to promote social distancing. These may include, but are not limited to: requiring proof of a negative molecular-based test prior to departure; designating a maximum number of passengers per cabin; designating only family groups per cabin; identifying set numbers of people and capacity allowed in shared areas; designated crew member at entrances monitoring temperature checks for staff and travelers; providing hand sanitizers for guests in all common areas and before boarding the vessel; reducing capacity during meals and eliminating family-style or buffet dining options; installing plastic or other barriers at check-in or information areas, food stations, and places where multiple guests congregate; sanitizing more frequently; using cleaning products and disinfectants meeting requirements for effectiveness against COVID-19 and with special attention to high-touch surfaces; and training all employees to recognize symptoms of COVID-19 and understand company policies for addressing outbreaks.

Question 5. Because reports of illness may lead to restrictions on crew activities, how should cruise ship operators encourage crew members to report mild symptoms of COVID-like illness to medical personnel?

Organizational culture is tremendously important when it comes to health and safety. Crew must feel safe from a health standpoint, as well as an employment standpoint, to report any health symptoms, not just those of COVID-19, through non-punitive leave policies for sick employees.

Per ATIA's best practices, businesses are requested to encourage employees to not report to work if they are ill and/or showing any symptoms and require staff to self-isolate if showing symptoms of COVID-19, awaiting test results, or diagnosed with COVID-19. Cruise companies should provide regular testing for crew. Should crew become ill, cruise ships could also designate space on-board to allow for isolation and quarantine, away from more crowded crew settings.

As much as possible, cruise lines should limit staff physical contact with customers through automated services or other physically removed options. Prior to departure or crew change, educate both employees and guests through ongoing training on company response plans, CDC guidance, and local health mandates.

Question 7. What pre-arrangements should be made to ensure that all U.S. seaport communities will accept a returning ship after a COVID-19 outbreak is identified?

Not all communities have the capacity to meet the healthcare or housing demands of thousands of cruise ship passengers and crew. Working with CDC and port communities, identify, negotiate, and designate multiple key U.S. ports of call to accept returning ships where COVID-19 has been identified. This may include identifying temporary or mobile quarantine or hospital facilities held in reserve of a potential ship-born outbreak.

Cruise ships should also work with communities to create standard mitigation, contingency, and crisis management plans. Having established relationships with local health officials will support communications and messaging if an outbreak is identified.

Question 13. What innovations should cruise ship operators develop to reduce transmission of COVID-19 on board ships and how would these innovations be effective?

In addition to providing COVID-19 prevention supplies in common areas, cruise lines can provide cloth face coverings and mandate use by passengers using shared (inside) areas. At such time rapid testing is available in volume, cruise lines can develop clear health screening policies and embarking/disembarking processes for passengers and crew.

Question 14. Should cruise ship operators implement other interventions to decrease or prevent the spread of COVID-19 on board ships?

Cruise companies could consider a 72-hour pause between sailings to support natural deactivation of the virus in addition to heightened cleaning and disinfecting conducted in compliance with CDC protocols on a regular and frequent basis.

In addition to proof of pre-testing prior to boarding, cruise companies could also require passengers to sign pre-departure screening forms or a passenger code of conduct signifying the passenger agrees they have not been in contact with someone that has tested positive with a case of COVID-19, been in contact with someone in the past 14 days, or are a recovering case and are less than 14 days from the onset; to report symptoms immediately; adhere to the ship's social distancing requirements; wear masks or other cruise-provided face covering when in public spaces; and limit interactions outside of their immediate travel circle. Passengers not agreeing to the requirements could be denied boarding. Passengers breaking the ship's passenger code of conduct may be denied re-boarding.

All company health and safety requirements and policies should be shared with passengers prior to booking and communicated frequently up to departure. Passengers can be given a pre-departure screening form or passenger code of conduct to sign, signifying they agree to follow the ship's health and safety protocols.

Resumption of Passenger Operations

Question 16. What steps should cruise ship operators take to prevent the introduction of COVID-19 onto ships after resuming passenger operations?

a. Should cruise ship operators deny boarding to passengers with COVID-like illness or confirmed infection with COVID-19?

Cruise ship companies should pre-screen passengers for COVID symptoms and require pre-testing before boarding. Cruise ship companies should deny boarding to passengers who have or exhibit symptoms of COVID-19 or who have come in contact with people who may be ill. Cruise ship operators can request passengers sign a passenger code of conduct prior to boarding, agreeing to report any signs or symptoms immediately to shipboard health care providers. Flexible refund policies will support passengers who might otherwise decide to sail while potentially ill.

b. Should cruise ship operators deny boarding to passengers with known exposure to a person with COVID-19 during the previous 14 days?

Given the high transmission rate, the number of asymptomatic cases of COVID-19, and delay in receiving timely test results, cruise ship companies should not allow passengers to board until they have shown negative test results.

c. What methods should cruise ship operators use to screen for exposures and detect COVID-like illness in passengers seeking to board the ship?

As soon as possible, cruise companies have the resources to implement rapid testing protocols for crew and passengers. Given the delay between exposure and symptoms, rapid tests should be performed frequently. Passengers should also sign a pre-screening questionnaire certifying they have not knowingly come into contact with a person with COVID-19 within 14 days of sailing. Cruise companies, like other companies, retain the right to refuse boarding to anyone not in compliance with company health and safety standards.

f. Should cruise ship operators test passengers and crew pre-boarding? If yes, what should the testing protocol be?

Polices should be put in place to standardize regular and frequent tests for passengers and crew, especially when rapid testing becomes readily available.

g. Should cruise ship operators transport and house passengers and crew denied boarding at the seaport to avoid exposing the public?

Cruise companies could add a refundable per-passenger fee to cover transportation and housing should it become necessary.

Working with CDC and port communities, cruise lines should work together to identify, negotiate, and designate multiple key U.S. ports of call to accept returning ships where COVID-19 has been identified. This may include identifying temporary or mobile quarantine or hospital facilities held in reserve of a potential ship-born outbreak.

Question 19. Should cruise ship operators limit shore excursions?

a. What precautions should cruise ship operators take during shore excursions to prevent passengers and crew from being exposed to COVID-19?

Cruise companies develop contracts with shore excursion providers years in advance. Many operators are currently developing operations and mitigation plans to address the potential of sick clients, and cruise companies could require all excursion providers have plans in place prior to renewing contracts or allowing guests to participate in a company's land-based activities.

When rapid screening is available, cruise lines could require testing of guests the evening before any ports of call to identify potential COVID-19 cases prior to disembarking passengers for shore excursions.

b. During shore excursions, how should cruise ship operators prevent transmission of COVID-19 into land-based communities?

Cruise companies could require contracted shore-based providers follow industry approved safety protocols and protocols particular to their community and/or destination. Cruise companies can also require contracted shore-based providers have approved safety and mitigation plans in place prior to allowing guest interaction. Excursion providers should also meet any updated capacity mandates identified by state and community guidance, promote

additional pre-screening of guests prior to the excursion, social distancing when grouped, and mandate face coverings for staff and guests in indoor settings.

Question 22. What precautions should the cruise line industry take to safely disembark passengers and crew without transmitting COVID-19 into local seaport communities?

Cruise ship companies should follow local and community or state public health guidelines and mandates and communicate these guidelines to staff and travelers. Companies can provide multiple tests during voyages, including prior to disembarkation in local communities and meeting community guidelines on testing, quarantining, social distancing, and capacity. Passengers and staff should be asked to sign on and off the ship and, if possible, respond to questions or temperature readings prior to disembarking and re-boarding. Interactions should be minimized until rapid testing becomes more widely available.

Question 26. How should cruise ship operators decrease or eliminate the risk for COVID-19 transmission for both passengers and crew in the following group settings?

e. Shore excursions?

Travel and tourism businesses providing shore excursions can adapt their staffing and operations to help mitigate the spread of the coronavirus and provide a safe environment for employees and guests.

Operators should limit the number of participants per group to state health and or community guidelines. Multiple groups can make reservations with a tour business and, if they are strategically managed, to maintain distance requirements before embarking on the tour and/or experience. Operators may also designate tours for family members only or by trusted travel group. Businesses are encouraged to have each member of a trusted group sign a waiver indicating they agree to travel together. Guided group size should meet any updated capacity mandates identified by state and community guidance; however, group sizes may differ based on space, capacity, and equipment. Social distancing of 6 feet apart when grouped should be maintained if possible. On guided tours with food service, businesses should have clear protective barriers, seating that is spaced to social distance guidelines, and protective gear - gloves and face coverings – for front-line staff.

Cruising is a key driver in Alaska's tourism economy. By working closely with CDC, we hope cruise ships can return to Alaska ports safely for the 2021 season. Again, on behalf of ATIA, thank you for the opportunity to respond to CDC's questions regarding safe cruise ship operations.

Sincerely,



Sarah Leonard
ATIA President & CEO



Dan Oberlatz, Alaska Alpine Adventures
Chair, ATIA Board of Directors