



## Milwaukee County COVID-19 Public Health Emergency

### Universal Face Mask Policy and Procedures Administrative Order 20-14v3

Version 1 Issued and Effective as of 12:01 a.m. on Thursday, June 4, 2020

Version 2 Issued Tuesday, July 28 and Effective as of 12:01 a.m. on Saturday, August 1, 2020

Version 3 Issued and Effective as of 12:01 a.m. on Monday, October 19, 2020

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The Centers for Disease Control and Prevention (CDC) recommends that face masks be worn to slow the spread of COVID-19, particularly in areas of significant community-spread transmission, such as Milwaukee County.<sup>1</sup> This Universal Face Mask Policy and Procedures Administrative Order outlines expectations for Milwaukee County employees, contractors, vendors, volunteers, service users, visitors, the general public, and all others entering or working in Milwaukee County facilities, grounds, or other places where services are delivered.

Version 3 of Milwaukee County's Universal Face Mask Policy and Procedures Administrative Order replaces 20-14v2, revising the County's face mask guidelines to align with recently updated guidance from the CDC. Major changes in Version 3 are denoted in red. This Administrative Order goes into effect at 12:01 a.m. on Monday, October 19, 2020.

If you have questions about this, or any other Administrative Order or policy, please email: [COVID-19@milwaukeecountywi.gov](mailto:COVID-19@milwaukeecountywi.gov)

#### **I. General**

COVID-19 is transmitted mainly by people interacting in close proximity with each other. A universal face mask policy serves to protect all employees, contractors, vendors, service users and the general public by providing a "source control" for all individuals who may have pre-symptomatic and asymptomatic COVID-19 infection should those individuals come into close contact with others. It is important to remember that **wearing a face mask does not eliminate the need to physically distance from each other**. This face mask policy is an important component of Milwaukee County's overall COVID-19 risk mitigation and response efforts.

#### **II. Types of Face Masks**

The following types of face masks are recommended by the CDC as effective in stopping the spread of COVID-19 and are acceptable for use in County facilities, grounds, or other places where services are delivered.

##### **Allowed:**

1. Cloth face masks **with two or more layers of breathable, washable fabric;** or
2. Disposable face masks, such as non-medical grade paper or procedure masks.
3. **FDA-approved face masks for sign language (ASL or LEP) interpreters (described in this section below).**

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<sup>1</sup> <https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/diy-cloth-face-coverings.html>

The following types of face coverings **are not recommended** by the CDC as effective in stopping the spread of COVID-19 and **are not acceptable** for use in County facilities, grounds, or other places where services are delivered.

**Not Allowed:**

1. Neck scarves or bandanas
2. Neck gaiters or buffs
3. Winter scarfs
4. Face shields
5. Masks with exhalation valves or vents
6. Masks with inappropriate writing or images

The type of face mask worn by workers and volunteers is determined by medical vs. non-medical settings and services provided. Any medical-grade surgical face masks or N95 respirators are reserved for healthcare workers, first responders, and others who work in high-risk environments. A medical-grade face mask is not required or recommended for a member of the general public, unless the department providing the service specifically requires it.

Milwaukee County recognizes that face masks present challenges to those who communicate through American Sign Language (ASL). Facial expressions are vital to conveying meaning in ASL, so when faces are obscured, the message can also be obscured. Accordingly, Milwaukee County will allow FDA-approved face masks for ASL or LEP interpreters.<sup>2</sup>

**III. County Employees, Contractors, and Vendors (together “Workers”), and Volunteers**

**A. Face Mask Usage Requirements** (see exemptions in Section IV)

1. Any worker or volunteer must wear a face mask at all times at County facilities, grounds, or other places where services are delivered (e.g., home visits), both indoor and outdoor.
2. At all times when a worker or volunteer is interacting with the public during their shift, the worker or volunteer must wear a face mask.
3. At all times a worker or volunteer is moving through a Milwaukee County facility, they must wear a face mask.
4. If a cloth face mask is worn by the worker or volunteer, they are expected to clean the mask after their shift, prior to wearing it again.
5. If a department’s operations or services require a separate face mask policy specific to recommended industry standards (e.g., healthcare, emergency response), the worker should follow industry face masks requirements. This policy is primarily designed for people who typically do not wear masks in their job functions, or times when a mask is not typically worn by a worker.
6. Workers and volunteers who require medical grade face masks or respiratory protection are required to wear cloth or disposable paper masks to comply with the universal face mask policy until reporting to their work area where medical-grade face masks or respiratory protection are distributed.

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<sup>2</sup> ClearMask: <https://www.theclearmask.com>

7. If a worker or volunteer forgets their cloth mask when reporting to work, they should use a paper face mask from the distribution at the point of entry.

## **B. Supply and Distribution of Face Masks for Workers and Volunteers**

Milwaukee County will provide its employees who cannot telework full time with up to five (5) washable cloth masks. Departments needing cloth masks for in-person workers should order cloth masks for their employees by entering a requisition in Marketplace Central. Employees may supply their own face masks but will not receive reimbursement for these purchases. Associated department expenses will be reimbursed through CARES funding.

Contractors and vendors will not be provided face masks by the County, unless otherwise decided by the managing department. Volunteers should wear their own face mask or may be given a disposable face mask upon entry to County facilities or grounds.

## **IV. Service Users, Visitors, and General Public (together, “Members of the Public”)**

### **A. Face Mask Usage Requirements**

Members of the public entering Milwaukee County facilities or grounds, both indoor and outdoor, or receiving County services in a different setting (e.g., home visit) shall wear a face mask (see exemptions in Section IV) as indicated:

#### **1. Indoor Milwaukee County Facilities or Indoor Service Areas**

Any person 3 years old or older shall be **required** to wear a face mask upon entry into any indoor Milwaukee County facility or indoor service area (e.g., a service user’s home; see exemptions in Section IV). Face masks are now required on County MCTS buses and at General Mitchell International Airport.

#### **2. Outdoor Milwaukee County Facilities and Grounds**

Any person 3 years old or older at an outdoor County facility or on County grounds shall be **required** to wear a face mask whenever the person is, or is likely to be, within 6 feet of any other person who is not a member of the person’s household (see exemptions in Section IV).

### **B. Supply and Distribution of Face Masks to Members of the Public**

The County will provide face masks to members of the public at all indoor County facilities and service areas. MCTS shall provide a limited number of disposable, single-use masks to riders who do not have their own mask. Face masks will be available at the customer service desks at the airport while federal supplies last. The County will be supplying masks at the Zoo to people who did not bring their own mask, but will typically not supply masks at outdoor Parks spaces (e.g., beer gardens, parks, marinas, beaches). A member of the public may use their own face mask.

**Departments or elected offices that manage entry points to County facilities or grounds shall be responsible for the requisition of disposable face masks and the process for distribution.** Departments operating within facilities should keep a small supply of disposable face masks on hand for instances in which a member of the public shows up without a mask. Non-medical grade disposable face masks can be requisitioned through Marketplace Central. The Re-Opening Steering Committee (ROSC) will support efforts to implement distribution processes, procedures, and trainings at the request of departments.

### **C. Local Service-Level Policies for Additional Risk Mitigation**

Departments and elected offices may have additional local policies related to face masks or other risk mitigation measures (e.g., health questionnaire, temperature screening) that go beyond the policies of this administrative order if additional risk mitigation is needed due to the nature of the service or the population being served. Departments and elected offices should notify the ROSC ([COVID-19@milwaukeecountywi.gov](mailto:COVID-19@milwaukeecountywi.gov)) of any additional risk mitigation measures being applied locally and the reason for the additional risk mitigation.

## **V. Exemptions from Wearing a Face Mask**

### **A. People Who are Exempted from Wearing a Mask<sup>3</sup>**

1. Children ages two (2) years old and younger.<sup>4</sup> Children ages 3 through 12 should only wear a face mask if a parent or guardian monitors to make sure it is worn safely. All children under 12 years old must remain within six (6) feet of parent/guardian, or household unit, and those who are small enough should be in a stroller or cart.
2. Anyone with a disability that makes it difficult to put on, wear, or remove a face mask.
3. Anyone consistently interacting with a person who is deaf or hard of hearing and primarily relies on lip reading.
4. Anyone who has been advised by a medical professional not to wear a face mask because of personal health issues.<sup>5</sup>
5. Anyone who has difficulty breathing<sup>6</sup> or is incapacitated.

### **B. Times When a Person May Temporarily Remove Their Face Mask**

1. Some services require that workers or members of the public not have a face mask on during certain times (e.g., witness in a court hearing, genetics test). Departments and elected offices may have local exemption policies for face mask removal for points in time; additional risk mitigation measures should be put in place per the minimum requirements in Administrative Order Phased Re-Opening Guidance for Milwaukee County Services and Facilities (20-13).<sup>7</sup>

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<sup>3</sup> Please note that the exemptions have been updated since Version 2 of this order to align better to CDC and the State of Wisconsin guidance. Departments managing facilities with mask dispensing stations should replace the existing exemption sign with the updated version on the [Signs SharePoint site](#).

<sup>4</sup> <https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/how-to-wear-cloth-face-coverings.html>

<sup>5</sup> Employees, contractors, and vendors must provide a note from their doctor to use this exemption.

<sup>6</sup> Employees, contractors, and vendors must provide a note from their doctor to use this exemption.

<sup>7</sup> See “Administrative Orders” Section: <https://county.milwaukee.gov/EN/COVID-19>

2. When consuming food or beverages when other risk mitigation measures are in place per the minimum requirements in Administrative Order Phased Re-Opening Guidance for Milwaukee County Services and Facilities (20-13).<sup>8</sup>
3. If a worker or volunteer is alone inside their enclosed office or work vehicle. This does not apply to cubicles unless the partition extends above 6 feet high, or the worker or volunteer is the only person in the entire cubicle workspace.
4. If a worker or volunteer is working alone outdoors, not in close proximity to other people (e.g., mowing grass, working at a single-person mechanical station in a garage).

### **C. Visual Marker for Exemptions**

1. **Employees:** Any exemption from this Order will require a request for accommodation and certification from a health care provider. If an employee requests an exemption, they must notify their supervisor and designated HR Business Partner as part of the request. An HR Business Partner will provide an employee with a qualifying exemption in the form of a yellow badge holder that they may wear as a visual marker to identify the exemption when moving through County facilities.
2. **Members of the Public:** Members of the public who state that they have a qualifying exemption to wearing a face mask should be provided an exemption sticker to wear while in County facilities, excluding buses and the airport. Stickers shall only be distributed at County facilities and grounds with controlled entry points. Members of the public do not need to provide any documentation of a qualifying exemption. Departments managing controlled entry points should order exemption stickers in Marketplace Central by searching “Face Mask Exempt Sticker” or “COVID-19 SIGN 013”.

## **VI. Enforcement Policy & Procedure**

**A. Employees:** Milwaukee County employees are expected to follow the face mask requirements. Employees who fail to follow any of the work rules outlined in this policy may be subject to disciplinary action, up to and including termination.

### **B. Members of the Public**

Enforcement of the policies in this Order will be based on the County facility per the below:

1. **Milwaukee County Courthouse Complex & Vel Phillips Juvenile Justice Center:**
  - i. Any member of the public who refuses to wear a face mask without a qualifying exemption shall be refused entrance. If the person refusing to wear a mask is at the Courthouse because of a mandated court hearing, subpoena, and/or a court case-related activity, facility security shall give that person a call list and tell them to call the appropriate number for instructions **before leaving the facility**. The court official will determine the next steps for the individual refusing to wear a mask.

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<sup>8</sup> See “Administrative Orders” Section: <https://county.milwaukee.gov/EN/COVID-19>

- ii. If a member of the public states that they have a qualifying exemption they will be allowed into the facility. Individuals with a qualifying exemption should be given a visual marker for their time in the facility upon entry.
- iii. Some departments or elected offices may have different and/or additional risk mitigation strategies (see Section III.D) or exemptions (see Section IV.B.1) in place for safe, effective delivery of their services and members of the public may therefore be subject to different and/or additional face mask requirements inside of the facility.
- iv. Trained law enforcement staff will be responsible for enforcing this order, and members of the public who fail to comply with face mask policies will be asked by law enforcement to leave the facility.

**2. Buses Operated by MCTS**

- i. Bus operators shall enforce the policy at the same time and in the same manner as fare collection; riders will be asked to wear a mask upon entry to the bus and if they refuse, or remove their mask during the ride, they may be encouraged to put a mask on for their own protection and that of other passengers.

**3. For all other County facilities, grounds, and service delivery locations:**

- i. Although members of the public who fail to comply with County face mask policies at County locations outside of the Courthouse Complex and Vel Philips Juvenile Justice Center will not be subject to County criminal or civil penalties, they may still be subject to face covering requirements and penalties under municipal laws and orders, such as the City of Milwaukee’s Face Covering Requirements (File 200426).
- ii. Some departments or elected offices may have different and/or additional risk mitigation strategies (see Section III.D) or exemptions (see Section IV.B.1) in place for safe, effective delivery of their services and members of the public may therefore be subject to additional face mask requirements before being able to access services; members of the public who fail to comply with this Order or local policies may be refused service.

**VII. Training and Communication**

Milwaukee County will make public announcement of the Universal Face Mask Policy to prepare the general public prior to entrance into County facilities or grounds. Departments and elected offices are responsible for notifying their vendors, contractors, and volunteers of the rules, expectations, and procedures in this Order.

The County has developed various signs to support knowledge of and adherence to the universal face mask policy, as well as signage for face mask distribution stations. All County signs may be ordered on Marketplace Central or can be printed locally using the PDFs [here](#).<sup>9</sup> Appropriate face

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<sup>9</sup> <https://milwaukeecountywi.sharepoint.com/sites/SignsforCOVID-19/SitePages/Signs.aspx>

mask signage shall be hung by the managing department of the County facility or service access points, at a minimum.

Milwaukee County employees are required to complete the assigned Learning Management System training module, “Strategies to Slow the Spread of COVID-19 in Milwaukee County,” for additional information on how to wear a face mask and how to help support compliance with the policy among members of the public on County grounds or using County services.

Departments or elected offices with local exemption policies (see Section IV.B.1) are responsible for documenting, managing, and communicating any policies to their employees. This includes policies related to exempting people from wearing a mask in order to deliver a service and whether services will or will not be denied if a member of the public is refusing to wear a face mask.