



Milwaukee County COVID-19 Public Health Emergency

Universal Face Mask Policy and Procedures Administrative Order 20-14v4

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

Version 4 Issued and Effective as of 12:01 a.m. on Tuesday, June 1, 2021

Version 5 Issued and Effective as of 12:01 a.m. on Thursday, July 1, 2021

Version 6 Issued and Effective as of 12:01 a.m. on Monday, July 12, 2021

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 transmission, such as Milwaukee County.¹ 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 5 of Milwaukee County's Universal Face Mask Policy and Procedures Administrative Order replaces 20-14v4. This Administrative Order goes into effect at 12:01 a.m. on Thursday, July 12, 2021. **Major changes are denoted in red.**

If you have questions about this, or any other Administrative Order or policy, please email: 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.
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.²

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

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

4. Medical-grade surgical face masks, N95 or KN95 respirators (typically reserved for use by healthcare workers, first responders, and others who work in high-risk environments).

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

III. Face Mask Requirements for County Employees, Contractors, and Vendors (together “Workers”), and Volunteers

A. Indoor Face Mask Requirements for Workers and Volunteers (see exemptions in Section V)

NOTE: Supervisors may seek verification of an employee’s vaccination status if required for staffing needs or by industry health and safety requirements. They may also seek verification of status in the context of a potential disciplinary action if there is credible evidence that an employee is misrepresenting their vaccine status to avoid face covering requirements.

1. Workers and volunteers who are **fully vaccinated**³ and who do **not** work in High Risk or Congregate Care facilities⁴ are not required to wear masks when not interacting with the public.
2. Workers and volunteers who work in High Risk and Congregate care facilities are required to wear masks at all times inside such facilities, regardless of whether or not they are vaccinated.
3. Workers and volunteers who are not fully vaccinated⁵ must wear face masks at all times while inside County facilities or inside other places where services are delivered (e.g., home visits). This includes wearing a face mask when moving through a facility, using a restroom, or being in other shared spaces inside the facility.
4. Fully vaccinated and unvaccinated workers or volunteers must wear face masks at all times when interacting with members of the public, whether or not those members of the public are vaccinated and whether or not the employee or volunteer is able to maintain physical distance from the public (that is, maintain at least 6 feet / 2 meters of

³ An individual is fully vaccinated after receiving two vaccinations in a two-dose vaccine series or one vaccination in a single-dose vaccine AND two weeks or more have passed since the individual received the final dose.

⁴ A High Risk or Congregate Living Facility houses individuals for eight hours or longer, including the County Jail, House of Correction, Behavioral Health inpatient hospital, and Division of Youth and Family Services youth detention center

⁵ <https://www.cdc.gov/coronavirus/2019-ncov/vaccines/fully-vaccinated.html>

distance). Masks are also required when employees or volunteers gather in a common space such as a courtroom or meeting room with members of the public, regardless of vaccination status of any individual or physical distances between individuals.

5. Fully vaccinated workers or volunteers are not required to wear a face mask while in a vehicle with other fully vaccinated people. Any unvaccinated individuals in the vehicle must wear masks.
6. If a worker or volunteer is alone inside their enclosed office, a cubicle with a partition that extends above 6 feet high, or a work vehicle, they are not required to wear a mask.
7. Workers and volunteers who require medical grade face masks or respiratory protection are required to follow above policies until reporting to their work area where medical-grade face masks or respiratory protection are distributed.

B. Outdoor Face Mask Requirements for Workers and Volunteers (see exemptions in Section V)

1. Milwaukee County workers and volunteers **do not** need to wear face masks in outdoor settings regardless of their vaccination status and regardless of their ability to physically distance (that is, maintain at least 6 feet / 2 meters of distance) from people, including colleagues and members of the public.
2. Maintaining physical distance between individuals remains a key component of managing the risk of COVID-19, especially for the unvaccinated, and wherever possible workers and volunteers should continue to maintain distance between themselves and others.

C. Other Guidance for Departments, Workers, and Volunteers

1. 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.
2. 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.
3. Workers and volunteers are expected to regularly wash cloth masks or replace a disposable mask after daily use.⁶

IV. Service Users, Visitors, and General Public (together, "Members of the Public")

A. Indoor Face Mask Requirements for Members of the Public (see exemptions in Section V)

1. Fully vaccinated and unvaccinated members of the public ages 3 and older must wear face masks while inside County facilities or when receiving County services indoors (e.g., home visits).
2. If attending private events held at County facilities, fully vaccinated members of the public are not required to wear masks. Unvaccinated members of the public and County employees regardless of their vaccination status who are attending private events held at County facilities are required to wear masks. No proof of vaccination status shall be required of any member of the public attending a private event.

⁶ <https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/how-to-wash-cloth-face-coverings.html>

3. Face masks are required at all times on Milwaukee County Transit System (MCTS) Buses and at General Mitchell International Airport. This requirement is consistent with current federal law.⁷
4. Face masks are required in indoor facilities that are adjacent to outdoor areas (e.g., golf shops, indoor exhibits at the Zoo, and indoor food service areas).

B. Outdoor Face Mask Requirements for Members of the Public

Fully vaccinated and unvaccinated members of the public are not required to wear a face mask on outdoor County grounds. Unvaccinated members of the public are strongly encouraged, though not required, to wear face masks at all times in outside public areas where consistent physical distancing is not possible.

C. 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, including on MCTS buses. The County will be supplying masks at the Zoo, or similar facilities, to people who did not bring their own masks. A member of the public may use their own face mask.

Departments or elected offices that manage entry points to County facilities 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.

V. Exemptions from Wearing a Face Mask

A. People Who are Exempted from Wearing a Mask

1. Children ages two (2) years old and younger.⁸ 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.⁹
5. Anyone who has difficulty breathing¹⁰ 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

⁷ <https://www.tsa.gov/news/press/releases/2021/04/30/tsa-extends-face-mask-requirement-airports-and-throughout#:~:text=The%20CDC%20recently%20announced%20that,hand%20or%20use%20hand%20sanitizer.>

⁸ <https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/how-to-wear-cloth-face-coverings.html>

⁹ Employees, contractors, and vendors must provide a note from their doctor to use this exemption.

¹⁰ Employees, contractors, and vendors must provide a note from their doctor to use this exemption.

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).¹¹

2. When consuming food or beverages indoors 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).¹²
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.

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 inside 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”.

V. 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.

¹¹ See “Administrative Orders” Section: <https://county.milwaukee.gov/EN/COVID-19>

¹² 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. 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. Some departments or elected offices may have different and/or additional risk mitigation strategies 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 entry or service by the managing department.