

Hot Topic: Considerations for Mask Policies

Question: Should my museum require staff and visitors to wear face masks when we reopen?

The American Alliance of Museums offers the following for consideration in determining policies around the wearing of face masks. The information shared here is based on the best available information as of publication and is not intended as legal, employment/human resources, or health and safety advice. Museums are encouraged to seek legal and other expert advice on their specific circumstances.

CDC guidance

With studies showing that a significant number of individuals with COVID-19 (coronavirus) lack symptoms, the Centers for Disease Control and Prevention (CDC) [recommends](#) wearing cloth face coverings in public settings where other physical distancing measures are difficult to maintain, especially in areas of significant community-based transmission. Cloth face coverings may slow the spread of the virus and help people who may have the virus and do not know it from transmitting it to others. The CDC does not recommend masks for children under the age of two due to the risk of suffocation, nor does it recommend masks for anyone who has trouble breathing or is unable to remove the mask without assistance.

State/local laws

Some [states](#) and local governments are requiring the wearing of masks in public places. Some are recommending but not mandating masks; others are requiring or recommending masks for certain types of businesses and/or in certain locations. Some states have not issued specific guidelines about the wearing of masks. Make sure that you are aware of the laws and mandates in your state/local area.

Legality and the Americans with Disabilities Act

Generally, an employer/business can institute safety policies or workplace rules such as requiring its employees to wear a face mask. Be mindful of abiding by the Americans with Disabilities Act (ADA) in creating and enforcing such policies, as individuals with a chronic disease that makes breathing difficult may be unable to safely wear masks or face coverings. The U.S. Equal Employment Opportunity Commission (EEOC) notes in [Pandemic Preparedness in the Workplace and the Americans with Disabilities Act](#) that "an employer may require employees to wear personal protective equipment during a pandemic. However, where an employee with a disability needs a related reasonable accommodation under the ADA, the employer should provide these, absent undue hardship." The Society for Human Resource Management (SHRM) offers [considerations](#) for businesses requiring their employees to wear masks in the workplace, as well as [information](#) on how to handle an employee's request for an ADA accommodation.

Businesses can also require customers/visitors to wear face masks when mandated by state or local law. Requiring visitors to wear masks when not mandated by state or local law can be murkier. In these cases, it is recommended that you seek legal guidance if your museum plans to require the wearing of masks for visitors. As with policies for employees, be mindful of ADA implications. Note that the ADA does allow restrictions when an individual would pose a "direct threat" to the health or safety of others; the EEOC has [stated](#) that "based on guidance of the CDC and public health authorities as of March 2020, the COVID-19 pandemic meets the direct threat standard." Consider using language in your policy that reflects the CDC recommendations for who should and who should not wear a mask (e.g., "This requirement does not apply to children under the age of 2 or to individuals who are unable to wear a face covering due to a medical condition"). The National Law Review provides additional information on [ADA considerations](#) for businesses requiring face masks for customers/visitors.

Training on proper use of masks

Whether mandating or recommending face coverings, be sure to offer your employees training in how to properly wear and clean their masks (see [CDC guidance](#)).

Accessibility

Transparent face covers are often helpful for individuals who are deaf or hard-of-hearing and rely on lipreading. If your museum requires face masks for employees, keep this in mind for staff members who interact regularly with members of the public and if you have individuals who are deaf or hard-of-hearing on your team.

Equity and racial implications

In thinking about your policies and how you will enforce them, it is important to consider the history and present-day realities of racial profiling. People of color, particularly black men, risk being profiled, harassed, or assaulted because of facial coverings. It is recommended that museum staff receive anti-bias training and develop awareness and understanding of ways that policies and laws designed to protect may endanger communities of color. It is essential to have a heightened awareness of increased levels of anxiety for both employees and visitors of color while making considerations around the use of masks. Safety comes first, but unfortunately for brown and black communities, mask wearing often makes it [more difficult to remain safe](#).

Availability of masks

Can your museum supply masks to all staff and visitors? If you are requiring masks as a condition of entry into the museum, providing free masks may be helpful to those who do not have, cannot afford, and/or did not bring their own. Some museums are also selling branded masks onsite and online (for example, see the Cincinnati Zoo's [animal-themed masks](#) and the Detroit Institute of Arts' [fine art masks](#)). If you will not have masks available to sell or give away, it is helpful to prepare people in advance for their visit by clearly communicating on your website, phone recordings, and/or social media channels that visitors should bring their own mask. Consider sharing information on how to make a mask at home (for example, the [instructions](#) or [video tutorial](#) from the CDC's website).

Tensions over masks, enforcement of policies, and employee training

It is important to be aware of the polarization around and politicization of the wearing of face masks and other health and safety measures. Confrontations and violence over mask-wearing have been reported in the news in recent weeks.

If masks are required (either by your museum or by the law in your area), consider how the policy will be enforced and who will enforce it. Train employees on how to handle violations and be sure that anyone being asked to enforce policies are properly trained and have authority (e.g., security personnel, senior leadership) to handle policy violations. Concerns around potentially putting employees in harm's way have led some businesses to decide to recommend but not require face masks or to be cautious in enforcing requirements if it seems that doing so could lead to threats or violence.

The Crisis Prevention Institute (CPI), the worldwide leader in evidence-based de-escalation and crisis prevention training, has shared [tips and tools](#) to address the urgent public need to anticipate and verbally calm situations related to COVID-19 before they escalate – such as [de-escalation tips](#) in light of coronavirus anxiety and [de-escalation trainings](#) for the workplace.

Communication

Communicate proactively with both staff and the public about COVID-19-related plans and protocols. Provide as much information as you can about your museum's health and safety guidelines, recommendations, and/or requirements on your website, telephone recordings, social media channels, etc. This will help people prepare for their visit, understand the measures you are taking to protect them, and reduce the chance of confusion or even confrontation on site. Also provide signage on site that communicates your policies, using language that is clear and simple. The following examples are shared for reference:

- » The National Cowboy Museum's [signage](#) about how to have a safe and enjoyable museum experience, including the recommendation that visitors wear masks
- » [Sign](#) at the Museum of Fine Arts, Houston about face mask requirements
- » Greyhound's [signage](#) about required face coverings

Feedback on this resource? Additional examples to share? Contact content@aam-us.org.

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The current crisis is taking a distressing financial toll on cultural organizations, and AAM is no different. In these challenging times, we ask that if you can, consider supporting our [advocacy work](#) and making extensive [COVID-19 resources](#) freely available for our field, by [making a donation](#) or [becoming a member of AAM](#). Thank you for your much-needed support.