



OSHA's Updated Outdoor and Indoor Heat-related Hazards National Emphasis Program

On April 10, 2026, OSHA updated its [National Emphasis Program](#) (NEP) to address indoor and outdoor heat hazards by focusing inspections and outreach on high-risk industries and workplaces. The revised NEP prioritizes on-site inspections for complaints and employer-reported hospitalizations, reserving rapid response investigations for limited cases with area director approval.

The updated NEP is effective immediately and will remain in place until April 10, 2031.

NEP Background

OSHA launched its original NEP on April 8, 2022. Through the program, OSHA conducts workplace inspections to identify heat-related hazards before workers suffer preventable injuries, illnesses or fatalities.

The NEP establishes heat priority days, when the heat index is expected to be 80 degrees Fahrenheit or higher. On those priority days, OSHA will:

- Initiate compliance assistance in the targeted high-risk industries; and
- Continue to investigate any alleged heat-related fatality, catastrophe, complaint or referral, regardless of whether the worksite falls within a targeted high-risk industry.

The NEP encourages employers to protect their workers from heat-related hazards during heat priority days by providing them with access to water, rest, shade and adequate training, as well as implementing acclimatization procedures for new or returning employees.

OSHA issued a [notice](#) in January 2025 that it would extend the effective date of its Outdoor and Indoor Heat-related Hazards [NEP](#) until April 8, 2026.

Action Items

Employers should review the updated NEP and any existing heat illness prevention program to ensure their policies are adequate and current.

Updated NEP Overview

The purpose of OSHA's updated NEP is to ensure that workers in high-hazard industries are protected from indoor and outdoor heat hazards that may cause serious illness, injury or death. The program applies OSHA-wide and focuses on:

- General industry;
- Construction;

- Maritime; and
- Agriculture.

The revised NEP supplements OSHA's response to complaints, referrals and severe incident reports by adding targeted enforcement in high-hazard industries and activities where heat exposure is prevalent.

Heat-related illnesses range from heat cramps to heat stroke, which can be fatal when body temperature exceeds approximately 104 degrees Fahrenheit. The heat index, used by the National Weather Service (NWS), combines temperature and humidity to reflect how hot conditions feel:

- Caution: <80 degrees Fahrenheit;
- Warning: 80-94 degrees Fahrenheit; and
- Danger: ≥95 degrees Fahrenheit.

OSHA emphasizes that serious heat-related illnesses and fatalities can occur below 80 degrees Fahrenheit, particularly when aggravating factors such as heavy workloads, personal protective equipment (PPE) or lack of acclimatization are present. Employers should implement acclimatization procedures that gradually increase workloads and rest break frequency for new or returning workers, while training them on heat-related hazards and actively monitoring them for signs of heat illness.

Additional technical considerations include:

- Wet Bulb Globe Temperature (WBGT) for evaluating heat stress;
- The National Institute for Occupational Safety and Health's (NIOSH) Recommended Alert and Exposure Limits; and
- The American Conference of Governmental Industrial Hygienists' Threshold Limit Values and Action Limits.

The [OSHA-NIOSH Heat Safety Tool App](#) may be used to monitor heat conditions. A heat priority day occurs when the heat index is expected to be 80 degrees Fahrenheit or higher.

State Plans are strongly encouraged by OSHA to adopt this NEP, but are not required to do so. By June 9, 2026, each State Plan must submit a notice of intent to OSHA indicating whether they already have a similar policy, intend to adopt new policies or do not intend to adopt this instruction.

High-risk Industries

The revised NEP targets industries identified using updated Bureau of Labor Statistics and OSHA data. These industries are selected based on factors including:

- High numbers or rates of heat-related illnesses;
- High numbers of severe cases of heat-related illnesses (e.g., death, hospitalization) or days away from work;
- OSHA inspection history involving heat-related violations; and
- Severe injury reports and hazard alert letters.

Appendix A identifies targeted industries and is organized into:

- Table 1: Nonconstruction industries likely to have heat-related hazards (ListGen targeting);
- Table 2: Construction industries likely to have heat-related hazards; and
- Table 3: Additional industries with known heat-related incidents not included in ListGen.

Targeted industries include both:

- Outdoor work environments (e.g., construction, agriculture); and
- Indoor environments with radiant heat sources.

Area Offices may also add industries based on local evidence, including:

- Injury and illness data;
- Workers' compensation data;
- Referrals or complaints; and
- Information from other agencies.

For industries newly added in the revised NEP, OSHA requires Area and Regional Offices to complete a 90-day outreach effort before initiating programmed inspections.

How Inspections Are Determined

To prevent heat-related illnesses and fatalities, OSHA's revised NEP requires compliance safety and health officers (CSHOs) to take a proactive, expanded approach to identifying potential heat hazards in the workplace. If evidence of heat-related risks is present, CSHOs are directed to expand the scope of an inspection or initiate a separate inspection or referral. These hazards may be identified through a variety of sources, including:

- Plain-view observations of working conditions;
- Reports or complaints from employees;
- Entries on OSHA 300 and 301 logs; or
- Information tied to severe injury reports, fatalities or catastrophes.

A key component of the NEP is the designation of heat priority days, which occur when the heat index is expected to reach 80 degrees Fahrenheit or higher. On these days, CSHOs conducting inspections for unrelated purposes must inquire about the employer's heat illness prevention measures. In addition, OSHA Area Offices may evaluate both indoor and outdoor worksites for potential heat hazards and provide worksite assistance where appropriate, even if no violation is immediately evident.

The NEP specifies that heat-related severe injury reports, referrals (including from the U.S. Department of Labor's Wage and Hour Division [WHD]) and other qualifying events are expected to result in an inspection unless a physical inspection is not feasible. The NEP prioritizes on-site, in-person response for complaints and all employer-reported hospitalizations related to heat hazards.

Programmed Inspections

Programmed inspections under the NEP are specifically triggered when the NWS issues a local heat warning or advisory. These inspections are not random; rather, they are conducted using neutral selection criteria and are based on randomized establishment targeting lists generated through OSHA's ListGen system. Area Offices must schedule these inspections using defined cycles to ensure consistency and fairness in enforcement.

Where possible, OSHA states it will conduct NEP inspections concurrently with other programmed inspections, such as Site-specific Targeting plans or other emphasis programs.

Unprogrammed Inspections

The revised NEP also introduces unprogrammed emphasis hazard inspections, which represent an expansion of OSHA's field enforcement capabilities. These inspections are initiated when CSHOs observe heat-related hazards while traveling to or between jobsites, particularly during periods of elevated heat. Unlike programmed inspections, these are not based on targeting lists and are commonly associated with outdoor work activities visible in plain view, such as construction or landscaping operations during heat alerts.

Another notable addition is the formal recognition of worksite assistance. When a violation is not identified, OSHA may still provide nonenforcement support to employers. This assistance can include education, practical guidance and recommendations aimed at preventing heat-related illnesses. Importantly, these activities must be documented within OSHA's internal systems, reflecting their growing role in hazard prevention.

In addition to programmed inspections, OSHA continues to conduct unprogrammed inspections, which arise from external inputs such as complaints, referrals (including those from the WHD), severe injury reports, and fatality or catastrophe incidents. These inspections are prioritized based on the severity and immediacy of the reported hazard.

Exemptions to Inspections

Under federal appropriations restrictions, OSHA's enforcement authority is limited for certain small employers. Farming operations that employed 10 or fewer workers at all times during the previous 12 months and have not maintained an active temporary labor camp during that period are fully exempt from OSHA enforcement. When determining employee counts, the farm owner's immediate family members are not included.

For small nonfarming employers with 10 or fewer employees operating in low-hazard industries, OSHA's limitations are more nuanced. These employers are generally exempt from programmed safety inspections; however, they may still be subject to programmed health inspections, including those related to heat hazards.

CSHOs are required to review OSHA Instruction [CPL 02-00-170](#), which outlines enforcement exemptions and limitations under the Appropriations Act, as well as the annually updated low-hazard industries table, before initiating enforcement activities. Additionally, employers participating in OSHA cooperative programs, such as the Voluntary Protection Programs or the Safety and Health Achievement Recognition Program, may also be exempt from programmed inspections, although they remain subject to other forms of enforcement if hazards are identified.

Scheduling Inspections

Inspection scheduling under the NEP follows the framework established in [OSHA's Field Operations Manual](#) and prioritizes inspections based on severity and urgency. The highest priority is given to fatalities, followed by catastrophes, complaints and referrals, follow-up inspections and finally programmed inspections.

A significant procedural update in the revised NEP is the implementation of cycle-based scheduling. Inspections are now organized using cycles derived from randomized master lists of establishments. Area Offices have flexibility in how they execute these cycles. They may:

- Inspect the entire list;
- Proceed in strict random order; or
- Divide the list into defined cycles that must be completed before moving on to the next group.

This approach ensures neutrality and consistency in inspection targeting.

Follow-up inspections play a key role in verifying hazard abatement. These inspections are typically conducted for establishments that have experienced heat-related fatalities resulting in citations, received serious violations or failed to verify that corrective actions have been implemented. Follow-up inspections may be conducted on-site, remotely or through a hybrid approach, depending on feasibility and resource availability. When an on-site visit cannot be conducted, employers may be required to submit written updates documenting their abatement efforts.

What to Expect

Establishments identified for programmed inspections will, where possible, have heat-related hazard inspections conducted concurrently with other programmed inspections. For employers with multiple locations engaged in similar operations, OSHA may notify corporate entities of any heat-related inspection and provide relevant information on required protective measures. Inspections will follow standard OSHA procedures, including an opening conference, walkaround and closing conference.

At the opening conference, CSHOs will verify the establishment's North American Industry Classification System (or NAICS) code and review OSHA 300 and 300A logs for the prior three calendar years and the current year to date to identify any heat-related illnesses.

During inspections for heat-related hazards, employers should expect that CSHOs will:

- Review OSHA 300 Logs and 301 Incident Reports for entries indicating heat-related illnesses;
- Review records of heat-related emergency room visits or ambulance transportation, even if hospitalizations did not occur (which may require a Medical Access Order);
- Interview employees, including new and recently returned workers, regarding symptoms such as headaches, dizziness, fainting or dehydration;
- Verify employer representations regarding workplace conditions and protections through employee interviews; and
- Evaluate whether the employer has implemented an effective heat illness prevention program.

CSHOs are also required to document findings in accordance with NEP inspection procedures, including applicable guidance in Appendix I (Evaluation of a Heat Program) and Appendix J (Citation Guidance).

OSHA will evaluate workplace conditions, including exposure to direct sunlight or radiant heat sources (such as hot vehicles, engines, furnaces, boilers or steam lines), the use of heavy or bulky PPE, workload intensity (moderate, heavy or very heavy) and the duration of employee exposure.

To support their evaluation, CSHOs may use tools such as the OSHA-NIOSH Heat Safety Tool App, historic weather data and, where necessary, WBGT estimates. When inspections occur on a date different from the reported incident, OSHA may reconstruct environmental conditions using historical data. Heat hazards may be evaluated even during inspections initiated for other purposes where conditions indicate potential exposure.

The central focus of the inspection is the effectiveness of the employer's heat illness prevention program. OSHA will assess whether the employer has implemented key elements such as access to water, rest breaks, cooling areas, acclimatization procedures, employee training, administrative controls (e.g., scheduling adjustments or job rotation) and appropriate emergency response procedures.

Even where no violation is identified, OSHA will conduct an intervention with the employer, which may include worksite assistance such as guidance and best practices to reduce heat-related risks.

Finally, the NEP reinforces worker protections. Employees are protected from retaliation for reporting heat hazards or participating in OSHA inspections. Any allegations of retaliation are referred to the OSHA Whistleblower Protection Program, and OSHA may coordinate referrals to other agencies, such as the WHD, where appropriate.

Source: [*OSHA Heat-related Hazard NEP*](#)

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