

Publications

OSHA Updates Heat Illness Prevention Program

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On April 10, 2026, OSHA published an updated National Emphasis Program (NEP) for outdoor and indoor heat-related hazards. The updated NEP largely mirrors the prior NEP, but adds new industries and changes some inspection and enforcement guidelines.

New Industries Included

The revised NEP updates the list of industries targeted for inspections, including new industries within construction, farming, manufacturing, retail, transportation, warehousing and restaurants. The updated list is available in [OSHA Instruction Appendix A](#) (page 26). New industries will receive a 90-day outreach period before targeted inspections begin.

Inspection and Enforcement

Under the revised NEP, compliance officers will continue to expand any inspection when there is evidence of heat-related hazards on “heat priority days” (days when the heat index reaches 80°F or above). Additionally, OSHA will conduct random inspections focused on heat hazards in high-risk industries on days when the National Weather Service issues a heat advisory or warning.

Still No Final Heat Standard

Even with the updates, OSHA still lacks a finalized heat-specific standard. OSHA issued a proposed heat-specific standard in 2024, but the rule remains in limbo following the intervening change in administrations. The practical effect of the lack of such a standard is that OSHA relies on the General Duty Clause of the OSH Act to cite employers for heat-related hazards. Citations under the General Duty Clause are typically more vulnerable to legal challenge than citations under specific OSHA standards.

Recommended Prevention Measures

A few practical steps, informed by the content of the NEP, remain best practices for employers seeking to mitigate the physical and legal risks of heat illness:

- Training employees and supervisors on heat illness symptoms, prevention measures, and emergency response;
- Establishing monitoring systems such as buddy systems or supervisory observation;
- Developing emergency response procedures for heat-related medical emergencies;
- Providing sufficient quantities of cool drinking water in readily accessible locations;
- Ensuring access to shade for outdoor workers and climate-controlled areas for indoor workers;
- Allowing adequate rest breaks in cool or shaded areas; and
- Implementing acclimatization protocols for new employees and those returning from extended absences.

Conclusion

While employers wait for word from OSHA on the proposed heat illness standard, the updated NEP provides further insight into the future of OSHA's approach to such issues. Employers should review their policies and practices to ensure they comply with both OSHA's proposed policies and developing state standards.