

OSHA's Revised Heat National Emphasis Program: What Employers Need to Know

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PRACTICES OSHA, Labor and Employment

OSHA issued a [revised](#) Heat National Emphasis Program (Heat NEP) for outdoor and indoor heat-related hazards, effective April 10, 2026, for a term of five years, that provides several notable changes over the prior Heat NEP (from 2022) including an updated list of targeted industries, updated inspection and citation procedures and mandatory outreach for newly targeted industries. This article summarizes the key updates and their practical recommendations for employers in covered industries.

- ***Updated Target Industry List***

Perhaps the most significant change is the revision to the list of industries targeted for programmed inspections (under Appendix A of the new Heat NEP). The list of targeted industries was updated essentially based on the following data: (1) high numbers or high incidence rates of heat-related illnesses from the Bureau of Labor Statistics (BLS) data from calendar years 2021 to 2024; (2) elevated number of days away, restricted or transferred (BLS) from calendar years 2021 to 2024; (3) high numbers of severe cases of heat-related illnesses, as indicated by death or hospitalization, from OSHA severe injury reports made by employers for calendar years 2021 to 2024 and (4) OSHA heat-related inspections of establishments with issued heat-related General Duty Clause 5(a)(1) violations and hazard alert letters from calendar years 2022 to 2025.

Compared to the 2022 Heat NEP, the data update resulted in the removal of 46 previously targeted industries, the addition of 22 new industries and the retention of 33 previous industries, for a total of 55 currently targeted industries. Employers should review Appendix A to determine whether their NAICS code is included in the updated list of targeted industries.

It should be noted that the Heat NEP does not limit OSHA's heat illness-related inspections to the covered industries. Essentially, any visible heat hazard at a worksite — even one not on the targeting list — may trigger an OSHA inspection. As such, all employers with potential outdoor or indoor heat exposures remain subject to unprogrammed heat hazard inspections based on complaints, referrals, severe injury reports or field observations by OSHA inspectors.

- ***Formalized Inspection and Citation Guidance***

The revised Heat NEP adds appendices that essentially formalize procedures previously addressed through informal guidance or dispersed throughout the directive:

Appendix I: Evaluation of a heat program — provides OSHA inspectors with a structured framework for assessing the adequacy of an employer's heat illness prevention program during inspection. The criteria in Appendix I could essentially serve as a compliance checklist for employers.

Appendix J: Citation guidance — consolidates and reorganizes guidance on when to issue citations versus Hazard Alert Letters and how to document General Duty Clause violations.

- **Mandatory Outreach for Newly Targeted Industries**

Newly added targeted industries will receive a mandatory 90-day outreach period before any programmed inspections. Covered employers may find it prudent to use this 90-day window for implementing or strengthening heat illness prevention measures as per Appendix I.

OSHA's outreach may include informational mailings, webinars and on-site compliance assistance. Employers that receive outreach communications should respond as/if requested by OSHA and document their compliance efforts.

- **Core Heat Illness Prevention Recommendations Remain Unchanged**

The fundamental elements of an effective heat illness prevention program remain consistent between the prior and the revised Heat NEP:

Water: Cool drinking water readily accessible to employees

Shade/cool areas: Access to shade for outdoor workers and climate-controlled areas for indoor workers

Rest: Scheduled and unscheduled rest breaks in cool or shaded areas

Acclimatization: Gradual exposure protocols for new employees and those returning from extended absence

Training: Education on heat illness symptoms, prevention measures and emergency response

Monitoring: Buddy systems or supervisory observation to identify early signs of heat illness

Emergency response: Procedures for responding to heat-related medical emergencies

OSHA continues to reference the OSHA-NIOSH Heat Safety Tool App and National Weather Service heat index categories, with a heat index of 80°F or above triggering "heat priority day" protocols.

Practical Recommendations

1. **Verify targeting status.** Review Appendix A to determine whether your NAICS code is included and whether it is newly added or retained from the prior Heat NEP.
2. **Benchmark against Appendix I.** Use the evaluation criteria in Appendix I as a self-audit checklist for your heat illness prevention program. Consider addressing any gaps.
3. **Capitalize on the 90-day outreach window.** Employers in newly targeted industries should use the 90-day outreach period to implement or strengthen heat illness prevention measures and document those efforts.

4. ***Train supervisors on recognition and response.*** Front-line supervisors should be trained on recognition of symptoms of heat illness, response and documentation.
5. ***Document acclimatization protocols.*** Maintain records of acclimatization schedules for new and returning workers, including any modifications based on individual health conditions or environmental factors.
6. ***Prepare for unprogrammed inspections.*** Even employers not on the targeting list may be inspected based on complaints, referrals, severe injury reports or field observations by OSHA inspectors.
7. ***Monitor state requirements.*** Employers in states with heat-specific standards should ensure their programs satisfy both federal and state requirements.
8. ***Track rulemaking developments.*** OSHA's proposed Heat Injury and Illness Prevention rule remains pending. Employers should monitor developments and be prepared to update programs when a final rule is issued.

In conclusion, while rulemaking for heat illness prevention remains pending, the revised Heat NEP reflects OSHA's continued prioritization of heat hazard enforcement. But in absence of a specific standard, OSHA will need to continue to rely on the General Duty Clause for citing employers for alleged employee exposure to heat hazard in the workplace. As such, employers should continue to assess and assert as appropriate defenses to the General Duty Clause violation when receiving heat hazard-related citations. Ensuring that their heat illness prevention programs meet OSHA's expectations as per the Heat NEP may boost those defenses.