

OSHA Updates Its Heat Emphasis Program

As heat-related illnesses continue to rise across the United States, the Occupational Safety and Health Administration (OSHA) has taken a significant step to help reduce that trend by updating and extending its National Emphasis Program (NEP) for Outdoor and Indoor Heat-Related Hazards, which expired in April 2026. The revised program, effective April 10, 2026, replaces the previous initiative and will remain in force through 2031. While not a formal regulation (although OSHA is working on it), the updated Heat Emphasis Program reshapes how OSHA will conduct inspections, target industries, and evaluate employer heat-illness prevention efforts over the next five years.

OSHA originally launched its Heat NEP in April 2022 as a response to growing evidence that excessive heat exposure—both outdoors and indoors—was leading to preventable injuries, illnesses, and fatalities. Since that time, OSHA has conducted approximately 7,000 heat-related inspections, issued dozens of General Duty Clause citations, and sent nearly 1,400 hazard alert letters to employers nationwide.

Data from OSHA and the Bureau of Labor Statistics (BLS) covering calendar years 2022–2025 showed that heat illness remains a widespread occupational hazard, prompting OSHA to conclude that a continued and more targeted enforcement approach was necessary. The revised NEP reflects lessons learned from the original program while modernizing inspection guidance and enforcement priorities.

Let's take a look at some of the updates.

Expanded and Rebalanced Target Industries

One of the most notable changes in the updated Heat NEP is a revised list of 55 high-risk industries targeted for programmed OSHA inspections. Using updated injury, illness, and enforcement data, OSHA:

- Removed 46 industries from the original list
- Retained 33 industries
- Added 22 new industries where heat hazards are now considered elevated

Industries commonly affected include construction, manufacturing, agriculture, warehousing, transportation, retail operations, and restaurants—many of which experience heat exposure even in indoor settings without climate control. Additionally, OSHA emphasizes that any employer—regardless of industry—may still be inspected if there is evidence of a heat-related hazard. The NEP does not limit enforcement authority strictly to the target list.

Heat Priority Days and Inspection Expansion

The revised NEP formalizes OSHA's use of "heat priority days," defined as days when:

- The heat index is forecast to reach 80°F or higher, or
- The National Weather Service issues a heat advisory or warning

On these days, OSHA compliance officers are instructed to:

- Expand the scope of any ongoing inspection if heat hazards are observed
- Conduct random, programmed heat inspections in high-risk industries
- Continue outreach and compliance assistance alongside enforcement activities.

This approach marks a more proactive and data-driven inspection strategy than in prior years.

New Appendices: Heat Program Evaluation and Citation Guidance

Another significant update is the addition of two reorganized appendices that standardize how OSHA evaluates employer heat-illness prevention efforts. These appendices effectively provide inspectors with a checklist for assessing whether an employer has implemented heat hazard controls. Inspectors are directed to evaluate elements such as access to water, rest and shade, acclimatization practices, training and environmental monitoring.

Employers can even use these new appendices as a guide to evaluate their own program:

- Appendix I – Evaluation of a Heat Program
- Appendix J – Citation Guidance

As you can see, OSHA's updated Heat Emphasis Program continues to be a long-term commitment to heat-hazard enforcement and identifies a growing recognition that heat poses a serious occupational risk. By extending the program through 2031 and formalizing inspection guidance, OSHA has signaled that heat illness prevention will remain a top priority for years to come.

To see the entire National Emphasis Program on Outdoor and Indoor Heat-Related Hazards, go to https://www.osha.gov/sites/default/files/enforcement/directives/CPL_03-00-024_0.pdf.

If you would like to know more about Sedgwick's safety services or would like to schedule a confidential consultation, please contact Andy Sawan at andrew.sawan@sedgwick.com or 330-819-4728.