



Summary of OSHA's Proposed Heat Standard

In August, OSHA proposed the first federal standard for [Heat Injury and Illness Prevention in Indoor and Outdoor Work Settings](#). If finalized, the standard would apply to all employers conducting outdoor and indoor work in all general industry, construction, maritime and agriculture sectors.

Requirements for Covered Employers

The proposed standard sets requirements for all covered employers, with some exceptions. Key elements of these requirements include training and recordkeeping responsibilities, as well as developing a Heat Injury and Illness Prevention Plan (HIIPP) with site-specific information for identifying and controlling heat hazards.

Elements of the HIIPP include, but are not limited to, the following:

- The HIIPP must list the heat metric used to comply (heat index or wet bulb globe temperature)
- The HIIPP must identify every heat safety coordinator, who is a managerial or non-managerial **employee tasked with ensuring workers comply with the standard's requirements**, on the jobsite
- The HIIPP must include emergency response procedures with details on employer responsibilities if an employee experiences signs and symptoms of heat-related illness or a heat emergency
- For employers with more than 10 employees, the HIIPP must be written in a language (or languages) that everyone on the worksite can understand and easily accessible for employees. Employers with 10 or fewer employees do not need written plans, but HIIPPs must be communicated to all employees in a language they understand
- Employers must seek the input of non-managerial employees in the development of the HIIPP
- Employers must review and evaluate the effectiveness of the HIIPP at least annually and whenever a recordable heat-related injury or illness occurs

OSHA's proposed recordkeeping requirements only applies to work performed in indoor areas, which OSHA defines as an area under a ceiling or overhead covering that restricts airflow and has along its entire perimeter walls, doors, windows, dividers, or other physical barriers that restrict airflow, whether open or closed. According to the standard, if there is a reasonable expectation that employees are or may be exposed to temperatures at or above 80 degrees Fahrenheit (80°F), employers conducting on-site measurements at indoor work areas must have written or electronic records of those indoor work area measurements and retain those records for 6 months.

Additionally, the standard sets training requirements for employees and supervisors/heat safety coordinators. Prior to performing work in an area that is at or above 80°F, employees must receive training on and understand heat stress hazards, signs, symptoms and risk factors for heat-related injuries and illnesses, the importance of drinking water and taking rest breaks, the locations of employer-provided water and rest areas, and more. Supervisors must be trained on all training requirements for employees, as well as the policies and procedures developed to comply with the standard and procedures the supervisor or heat safety coordinator must follow if an employee exhibits signs and symptoms of heat-related illness.

Requirements Under the Initial and High Heat Triggers

The standard proposes requirements for when a jobsite is at or above the initial heat trigger (heat index of 80°F or similar wet bulb globe temperature level). These requirements include:

- **Providing “suitably cool” drinking water to all employees, with at least one quart of water per employee per hour**
- Shaded or air-conditioned break areas that can comfortably fit as many employees as would be taking a break at any given time
- Indoor work area controls that increase air movement, such as fans or comparable natural ventilation. When appropriate, employers should also implement de-humidification, air-conditioning or controls for radiant heat sources
- Acclimatization plans for new and returning employees
 - OSHA has proposed two options to comply under this requirement, both of which last for roughly the first week a new/returning employee is on the job
- Paid rest breaks as needed
- Effective two-way communication between employers and employees (either in-person or electronic)

OSHA is also proposing requirements at or above a high heat trigger (heat index of 90°F or similar wet bulb globe temperature level). When a jobsite is at or above this trigger, all requirements under the initial heat trigger apply, in addition to the following:

- Paid rest breaks for a minimum 15 minutes every two hours
 - Unpaid meal breaks may serve as a rest break
- Observation for signs and symptoms of heat-related illness, such as supervisor observation or an **employees “buddy system”**
 - Employers must establish effective two-way communication at least every two hours with employees working alone at work sites
- Hazard alerts with info on the importance of drinking water, rest breaks and emergency response procedures

Public Feedback

OSHA is seeking public comments through Jan. 14, 2025. The agency released a [compilation of requests for comment](#), with questions on various elements of the proposed standard, including the HIIPP, training requirements, the initial and high heat triggers, requirements under these heat triggers, and more. Comments responding to the agency proposal can be submitted through [Regulations.gov](#).

NAHB will submit comments to OSHA in response and is seeking member feedback on these questions and what you are currently doing to identify common heat hazards, avoiding heat stress and responding to heat-related injuries and illness on your jobsites. If you would like to provide feedback, email Safety@nahb.org or contact **Brad Mannion**, NAHB’s Labor, Safety & Health Director, at Bmannion@nahb.org.

