



IN THE BUSINESS OF YOUR SUCCESS®

## Heat Illness Prevention Program

### OSHA Requirements for a Heat Illness Prevention Program



The Occupational Safety and Health Act (OSHA) and some OSHA-approved state programs have standards that apply to heat in outdoor environments. Under Federal OSHA, heat illness is considered a recognized hazard under the general duty clause, and, under Cal/OSHA, for example, the specific standard is CCR Title 8 §3395. Heat illness is a serious medical condition that results from the body's inability to cope with a particular heat load. Heat illnesses include heat stroke, heat exhaustion, heat collapse, heat cramps, heat rash, and heat fatigue.

To be compliant with heat illness prevention standards, employers must ensure their heat illness prevention program includes the following elements.

---

#### 1. Potable Water Requirements

Employers must provide, free of charge, water that is fresh, pure, and suitably cool. Additionally, the water must be located as close as practicable to the areas where employees are working, unless the employer can demonstrate infeasibility. If the employer cannot otherwise continuously supply or replenish employees' water, the employer must provide water in sufficient quantity at the beginning of the shift, which is a minimum of one quart of fresh, pure, and suitably cool water per hour for the entire shift.

#### 2. Shade Requirements

Employers must provide shade when the outside temperature exceeds 80 degrees Fahrenheit. The shade must be located as close as practicable to the areas where employees are working. The amount of shade present must be at least enough to accommodate the number of employees on recovery or rest periods and meal periods so that employees can sit in a normal posture fully in the shade without having to be in physical contact with each other. Where the employer can demonstrate that it is infeasible or unsafe to have a shade structure, or otherwise to have shade present on a continuous basis, the employer may use alternative procedures for providing access to shade if the alternative procedures provide equivalent protection.

#### 3. Preventative Cool-Down Rest Periods

Employers must allow and encourage employees to take a minimum of five-minutes for a cool-down rest period in the shade if they feel they need to protect themselves from overheating. In addition to allowing and encouraging employees to take cool-down rest periods, employers are required to monitor and ask employees taking rest periods whether employees are experiencing sign and/or symptoms of heat illness. Employers are prohibited from ordering employees to work until signs and/or symptoms of heat illness have been abated.

If an employee exhibits signs and/or symptoms of heat illness while taking a preventative cool-down rest period, the employer must provide appropriate first-aid or emergency response according to its heat illness prevention program.

---

#### HR. Payroll. Benefits.

#### **4. High-Heat Procedures**

Employers must implement high-heat procedures when the temperature equals or exceeds 95 degrees Fahrenheit. Employers must ensure that there is effective communication [voice, observation, or electronic means] between supervisors and employees, and employers must observe employees for alertness and signs and/or symptoms of heat illness. To comply with high heat requirements, employers should assertively monitor employees by instituting a one supervisor to twenty or fewer employee ratio, a mandatory buddy system, a regular communication through electronic device routine with each employee, or another effective means of communication. Employers should also designate one or more employees on each worksite as authorized individuals for ensuring emergency medical services can be contacted and accessed. If there is no designated person on the worksite, employers must instruct all of its worksite employees to call for emergency services when required.

In addition, pre-shift meetings, also known as tailgate meetings, must be conducted before the commencement of work on each shift during high heat conditions. The shift meetings should review high heat procedures, encourage employees to drink plenty of water, and remind employees of their right to take a cool-down rest break when needed.

#### **5. Emergency Preparedness Requirements**

Employers must implement effective emergency response procedures, which include the following.

- A.** Ensure that effective communication by voice, observation, or electronic means is maintained so that employees at the work site can contact a supervisor or emergency medical services when necessary. An electronic device, such as a cell phone or text messaging device, may be used for this purpose only if reception in the area is reliable. If an electronic device will not furnish reliable communication in the work area, the employer must ensure a means of summoning emergency medical services.
- B.** Respond to signs and/or symptoms of possible heat illness, including but not limited to, first-aid measures and how emergency medical services will be provided. If a supervisor observes, or any employee reports, any signs and/or symptoms of heat illness in any employee, the supervisor must take immediate action commensurate with the severity of the illness. If the signs and/or symptoms are indicators of severe heat illness such as, but not limited to, decreased level of consciousness, staggering, vomiting, disorientation, irrational behavior, or convulsions, the employer must implement emergency response procedures, including contacting emergency medical services and, if necessary, transporting employees to a place where they can be reached by an emergency medical provider and ensuring that, in the event of an emergency, clear and precise directions to the work site can and will be provided as needed to emergency responders.
- C.** An employee exhibiting signs and/or symptoms of heat illness must be monitored and must not be left alone or sent home without being offered onsite first-aid and/or being provided with emergency medical services in accordance with the employer's procedures.

#### **6. Acclimatization**

Employers must ensure that (1) newly hired employees, (2) employees that have not worked under comparable hot conditions, and/or (3) employees have been away from hot work areas for more than a week follow acclimatization procedures for the first 14 days of the employee's employment working outdoors or in a high heat area. Acclimatization is a temporary adaptation of the body to work in the heat that occurs gradually when a person is exposed to it. Acclimatization peaks in most people within four to 14 days of regular work for at least two hours per day in the heat. Employers must closely monitor employees for the first 14 days of his or her employment in a high heat area.

In addition, the employer must closely observe all employees during a heat wave, which is defined under regulations as any day in which the predicted high temperature for the day will be at least 80 degrees Fahrenheit and at least ten degrees Fahrenheit higher than the average high daily temperature in the preceding five days.

## 7. Training

### Employees

Employers must train their employees in (1) the employer's responsibility to provide water, shade, cool-down rests, and access to first-aid; (2) the employees' right to exercise their rights under the heat illness standard without retaliation; (3) first-aid and emergency response procedures; (4) concepts and methods of acclimatization; (5) environmental and personal risk factors for heat illness; (6) the importance of frequent consumption of small quantities of water, up to a minimum of four cups per hour; (7) the different types of heat illnesses, the common signs and/or symptoms of those heat illnesses, appropriate first-aid and/or emergency medical responses to those types of heat illnesses, and that heat illnesses may progress quickly from mild signs and/or symptoms to serious and life-threatening signs and/or symptoms; (8) the importance of employees immediately reporting to the employer, directly or through the employee's supervisor, signs and/or symptoms of heat illness in themselves or in co-workers; (9) the employer's procedures for responding to signs and/or symptoms of possible heat illness, including how emergency medical services will be provided should they become necessary; (10) the employer's procedures for contacting emergency medical services, and if necessary, for transporting employees to a point where they can be reached by an emergency medical service provider; and (11) the employer's procedures for ensuring that, in the event of an emergency, clear and precise directions to the work site can and will be provided as needed to emergency responders, which includes procedures of designating a person to be available to ensure that emergency procedures are invoked when appropriate.

### Supervisors

Employers must also provide specific training to supervising employees performing work that should reasonably be anticipated to result in exposure to the risk of heat illness including (1) all of the required elements of employee training; (2) procedures the supervisor must follow to implement the applicable provisions of the employer's heat illness prevention program; (3) the procedures the supervisor must follow when an employee exhibits or reports signs and/or symptoms consistent with possible heat illness, including emergency response procedures; and (4) how to monitor weather reports and how to respond to hot weather advisories.

**Note:** *Training requirements must be provided to each supervisory and non-supervisory employee before the employee begins work that should reasonably be anticipated to result in exposure to the risk of heat illness.*

## 8. Heat Illness Prevention Program

It is recommended that employers develop and maintain a heat illness prevention program to address heat exposures.

In California, employers are required to address any outdoor heat illness exposures by (1) establishing, implementing, and maintaining an effective written heat illness prevention program in English and in any language understood by the majority of the employees, (2) the program must be made available to employees at the worksite and to OSHA representatives upon request; and (3) the program must specifically include procedures for the provision of water, access to shade, high heat procedures, emergency response procedures, and acclimatization methods and procedures.

In Washington, employers can address their outdoor heat illness exposures through a heat illness prevention program in their written accident prevention program (APP).

For assistance with complying with heat illness prevention requirements, implementing a heat illness prevention program, and/or employee heat illness prevention awareness training, please contact your dedicated ADP Risk & Safety Consultant.