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OSHA Heat NEP Employer Compliance Checklist

Based on Appendix I of Directive CPL 03-00-024 | Effective April 10, 2026

How to use this checklist: These items are drawn directly from OSHA's Appendix I "Evaluation of a Heat Program" — the 11-point checklist inspectors use when assessing your worksite. A "yes" on every item puts you in the strongest defensible position under the Heat NEP.

1. Heat Illness and Injury Prevention Program [Appendix I, Item 1]

- A heat illness and injury prevention program exists (written or verbal)
- The program is effectively communicated to all employees
- Supervisors and employees can describe the key elements of the program

2. Ambient Temperature Monitoring [Appendix I, Item 2]

- The employer has a method for monitoring ambient temperature at the worksite
- The employer monitors levels of work exertion alongside temperature
- Monitoring covers both heat index and dry bulb temperature where applicable
- For indoor worksites, radiant heat sources are identified and accounted for

3. Cool Water Access [Appendix I, Item 3 + 29 CFR 1910.141 / 1926.51]

- Sufficient amounts of cool, potable water are provided at the worksite
- Water is located in a place familiar to employees and readily accessible near the work area
- Water is available in sufficient quantity for the full duration of the work
- Employees are permitted to drink frequently (NIOSH recommends every 15 minutes)

4. Additional Hydration Breaks [Appendix I, Item 4]

- Employees are allowed to take additional breaks specifically for hydration
- Break frequency increases as heat conditions worsen

5. Scheduled Rest Breaks [Appendix I, Item 5]

- Scheduled rest breaks are in place during hot working conditions
- Rest break duration and frequency reflect ambient temperature and work exertion levels

6. Access to Shaded or Cool Rest Areas [Appendix I, Item 6]

- Employees have access to a shaded or cool area during rest breaks
- For outdoor worksites: shade is provided or available near the work area
- For indoor worksites: a cooler area (e.g., air-conditioned space) is accessible
- The shaded or cool rest area is familiar to and accessible by all employees

7. Acclimatization for New and Returning Workers [Appendix I, Item 7]

- New workers are gradually introduced to hot conditions before full-duty assignment
- Workers returning from extended absences are treated as unacclimatized
- Workloads for unacclimatized workers are gradually increased over time
- New and returning workers receive more frequent rest breaks during the acclimatization period
- Workers are monitored for signs of heat illness during acclimatization

8. Administrative Controls to Limit Heat Exposure [Appendix I, Item 8]

- Earlier start times are used when possible to avoid peak heat hours
- Workload adjustments are made on high-heat days
- Employee and job rotation is used to limit individual heat exposure
- Hot jobs are scheduled for cooler parts of the day or cooler seasons where possible
- Relief workers are used to reduce physical demands during extreme heat

9. Heat Illness Training [Appendix I, Item 9]

- Employees and supervisors are trained on:
 - Signs and symptoms of heat illness (heat cramps, exhaustion, stroke)
 - How to report signs and symptoms
 - First aid procedures for heat illness
 - How to contact emergency personnel
 - The employer's heat illness prevention program
 - The importance of hydration
- Training addresses medications and health conditions that increase heat risk
- Training is provided before the start of hot weather season and for new hires

10. Employee and Supervisor Understanding [Appendix I, Item 10]

- Employees can demonstrate they understand the heat program
- Supervisors can describe their responsibilities under the program
- All team members know what to do when heat thresholds are reached

11. Designated Heat Safety Representative [Appendix I, Item 11]

- A designated heat safety representative is assigned to manage the program
- The representative is identified to all employees
- The representative is trained and actively manages the heat program

12. Recordkeeping [Appendix J + 29 CFR 1904.7(b)(5)]

- OSHA Form 300 and 300A logs are current and accurately maintained
- Heat-related illnesses requiring medical treatment beyond first aid are recorded
- OSHA Form 301 incident reports exist for any recorded heat-related illness
- Records are available for OSHA review upon request

Note: Not all NEP industries are required to maintain OSHA records — verify your status

Notes / Additional Observations

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