

A10 COMMITTEE

CONSTRUCTION AND DEMOLITION OPERATIONS

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OSHA Heat Stress National Emphasis Program **ANSI/ASSP A10.50 Standard – Impact on Compliance**

The U.S. Department of Labor's Occupational Safety and Health Administration (OSHA) updated its [National Emphasis Program \(NEP\) for Outdoor and Indoor Heat-Related Hazards](#) on April 10, 2026. This revised program is effective immediately and is scheduled to remain in place for five years.

The updated NEP targets 55 high-risk industries—including construction, agriculture, and manufacturing—based on recent data (2022–2025) regarding heat-related illnesses and fatalities.

Key Components of the Updated NEP

- Targeted Inspections: OSHA will conduct programmed inspections on days when the National Weather Service (NWS) issues a heat warning or advisory.
- 90-Day Outreach Period: Newly targeted industries receive a 90-day window of mandatory outreach and compliance assistance before programmed inspections begin.
- Enhanced Guidance: The update includes two new appendices:
 - Appendix I: A structured framework for assessing employer heat illness prevention programs.
 - Appendix J: Consolidates guidance on issuing citations and Hazard Alert Letters under the General Duty Clause.
- Emphasis on Consultations: The program prioritizes OSHA On-Site

Compliance Checklist for Employers

During inspections, OSHA compliance officers evaluate whether businesses are providing:

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- Water: Cool, free drinking water must be readily accessible.
- Rest & Shade: Scheduled and unscheduled rest breaks in shaded (outdoor) or climate-controlled (indoor) areas.
- Acclimatization: A written plan to gradually increase work exposure for new or returning employees.
- Training: Training for supervisors and workers on identifying symptoms and emergency response.
- Monitoring: Utilizing buddy systems or supervisor observation to detect early signs of heat stress.

While this NEP provides a framework for enforcement, OSHA's permanent federal heat standard—proposed in 2024—remains pending as of April 2026. ASSP has received numerous inquiries from ASSP members and OSH Stakeholders about the NEP and how the ANSI/ASSP A10.50 Standard would provide compliance with OSHA.

ASSP member and recognized OSH Attorney, Phillip B. Russell from the firm| Ogletree Deakins, provided this key insight: “...*It needs to be noted that following the [ANSI/ASSP A10.50-2024 standard](#) does not by itself legally guarantee compliance with OSHA’s Heat National Emphasis Program (NEP). Although the ANSI/ASSP standard is in some ways more robust than the NEP or OSHA’s proposed heat standard, it is not a regulatory mandate for employers. Employers who attempt to follow the ANSI/ASSP standard, however, would have strong arguments that they have implemented alternative means of abatement, which is a fundamental requirement of complying with the OSH Act’s General Duty clause, Section 5(a)(1). Under the General Duty clause, employers must maintain a workplace free from recognized hazards. And, heat would almost certainly be a recognized hazard for the targeted industries identified in the NEP. While A10.50 is a formidable standard, compliance with ANSI/ASSP A10.50 would not provide defense for all specific situations...*”

Compliance Aspects

- Strong Defense: Implementing the ANSI/ASSP A10.50 standard could assist employers in defending against alleged General Duty Clause

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- violations by proving they implemented alternative means of abatement..
- Coverage Gap: The ANSI standard is designed for construction and demolition, while the OSHA NEP applies to all industries with heat hazards. This is a key issue since by scope the standard does not apply to general industry. That does not mean sections of the standard could not be used in other settings, but by scope the standard does not address workplaces outside of construction and demolition operations.
 - Voluntary vs. Mandatory: A10.50 is a voluntary consensus standard, not a federal regulation. However, OSHA uses such standards to evaluate if an employer took necessary precautions. There is a memorandum of understanding between OSHA and ANSI on the use of such standards.
 - Program Requirements: A10.50 addresses key requirements, such as heat acclimatization protocols, employee training, and medical monitoring.

Following A10.50 is widely considered a "best practice" that often exceeds minimum OSHA expectations.

Key Interplay With Compliance

- The Compliance Gap: ANSI/ASSP A10.50 is a voluntary consensus standard, whereas the OSHA NEP is an enforcement directive. While they are not the same thing, OSHA often uses consensus standards like ANSI to define what a "recognized hazard" is and what "alternative" abatement looks like.
- "More Robust" Requirements: Subject matter experts from the American Society of Safety Professionals (ASSP) note that A10.50 is often more comprehensive than OSHA's current guidance. For instance, A10.50 requires a Qualified Person to perform task hazard analyses and strongly prefers the Wet Bulb Globe Temperature (WBGT) index, whereas OSHA's current guidance allows more flexibility (like using basic heat index forecasts).
- Good Faith Defense: Implementing A10.50 can bolster an employer's defense against a General Duty Clause violation by demonstrating

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"good faith" compliance and a proactive effort to meet the industry's highest safety benchmarks.

Of importance is an additional issue pointed out by ASSP member Mike Hayslip, who is also a well know attorney, A10 Committee member, and Certified Safety Professional working with construction and demolition operations: *"...It is critical that OSH Professionals working in the OSHA State-Plan-States, or having operations in such states, need to be aware of requirements in these state plans. As of early 2026, seven U.S. states with OSHA-approved State Plans have specific, enforceable regulations regarding worker heat stress. These regulations typically require employers to provide water, rest breaks, shade, and training to prevent heat-related illnesses. However, occupational safety and health professionals would need to review each individual plan for specific requirements..."*

- ✓ *California*
- ✓ *Colorado*
- ✓ *Maryland*
- ✓ *Minnesota*
- ✓ *Nevada*
- ✓ *Oregon*
- ✓ *Washington*

Comparison of Core Requirements

Feature	OSHA Heat Stress NEP Expectations	ANSI/ASSP A10.50-2024 Standard
Written Plan	Highly recommended as evidence of a prevention program.	Mandatory: Requirement for a formal Heat Stress Management Program.
Metrics	Generally uses Heat Index; permits WBGT.	Strongly recommends WBGT for higher accuracy.

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Personnel	Recommends a supervisor or "heat safety coordinator".	Requires a Competent or Qualified Person for hazard analysis.
Acclimatization	Core requirement for new/returning workers.	Includes detailed, science-based acclimatization protocols.

The other inquiry addresses the key differences between A10.50 and the NEP.

Key differences that make the ANSI/ASSP A10.50-2024 standard superior in scope:

- **Advanced Risk Measurement:** A10.50 uses WBGT's, which accounts for humidity, sunlight, wind speed, and radiant heat. The OSHA proposal relies heavily on the heat index, which is often less precise.
- **Comprehensive Controls:** A10.50 explicitly covers worker acclimatization schedules, specific training for supervisors/employees, and detailed checklists to identify and mitigate hazards.
- **Defined Stop Work Authority:** The A10.50 Standard dictates that a competent person must be designated to recognize risks and has the authority to stop work, as detailed in an ASSP news post.
- **Actionable Best Practices:** The document, officially titled *Heat Stress Management in Construction and Demolition Operations*, provides in-depth technical guidance that fills the void of federal regulations.

While the OSHA special emphasis program is a legal enforcement tool, the ANSI/ASSP A10.50 standard offers rigorous, proactive, and actionable measures for actually protecting workers on the ground.

The American Society of Safety Professionals (ASSP) asserts that the A10.50 standard is more robust due to several critical technical and procedural differences:

- **More Accurate Metrics:** A10.50 relies on WBGTs, which measures sunlight, air movement, and local radiant heat. In contrast, OSHA's

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program often relies on the standard Heat Index, which does not account for these specific outdoor factors.

- **Clear Authority:** The A10.50 standard requires "Stop Work Authority" for safety reasons and explicitly defines the role of a "Competent Person" to manage heat risks. These specific roles and authorities are absent from the OSHA NEP.
- **Technical Depth:** Developed over three years by a committee of 30 experts, A10.50 includes detailed flowcharts and checklists for medical monitoring, buddy systems, and specific hydration requirements (e.g., one quart per hour) that go beyond OSHA's general guidance.
- **Comprehensive Scope:** While OSHA's NEP is limited by the General Duty Clause for enforcement until a final federal rule is passed, A10.50 offers immediate, "best-practice" guidance that covers acclimatization, training, and emergency action plans in much greater detail.

Comparison Overview – Content and Requirements

Feature	ANSI/ASSP A10.50-2024	OSHA Heat Stress NEP
Primary Purpose	Comprehensive prevention framework	Enforcement and inspection targeting
Primary Metric	WBGT	Heat Index
Key Safety Role	Defined "Competent Person"	General supervisory oversight
Authority	Explicit "Stop Work Authority"	Not explicitly required
Enforcement	Voluntary consensus standard	Legally enforceable (fines)

Background on the ANSI/ASSP A10.50 Standard

ANSI/ASSP A10.50-2024 Standard for Heat Stress Management In Construction

A10.50 Preview

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The purpose of this standard is to reduce the risk to workers of adverse occupational health effects from heat stress due to heat exposures in construction and demolition operations.

This standard establishes the minimum requirements for the prevention of heat illnesses and management of heat stress hazards and exposures encountered during construction and demolition operations. It establishes procedures for the management of heat stress hazards and the selection and use of appropriate controls and practices to reduce risks presented by heat stress and prevention of heat illnesses for all work environments.

Conclusion and Actionable Step

You should compare your current program against the revised OSHA Heat NEP (effective April 10, 2026) and ANSI/ASSP A10.50 to address coverage of specific target industries and outreach mandates recently updated by the agency.

Additional Heat Stress Resources

- ✓ [ANSI / ASSP A10 Construction & Demolition Standards | ASSP](#)
- ✓ [Position Statements](#)
- ✓ [Episode 133: Using the A10.50 Standard to Help Workers Beat the Heat](#)
- ✓ [Episode 161: ANSI/ASSP A10.50 - Keeping Workers Cool and Hydrated on the Job Site](#)
- ✓ [ASSP Offers Key Insights on OSHA's Proposed Heat Injury and Illness Prevention Standard](#)
- ✓ [OSHA Proposes Long-Awaited Heat Standard](#)

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- ✓ [ASSP Publishes First Standard on Heat Stress in Construction](#)
- ✓ [ASSP Testifies on OSHA Heat Rule to Protect Workers Nationwide](#)
- ✓ [ASSP Committee Proposes Heat Stress Management Standard](#)
- ✓ [ASSP Statement on OSHA's Proposed Heat Rule](#)
- ✓ [OSHA Moving Heat Safety Rulemaking Forward](#)