



Indoor Heat Illness Prevention: Essential Requirements

Overview

While employers in outdoor settings have been subject to heat illness prevention requirements for years, California employers must now also satisfy *indoor* heat rules. Cal/OSHA's indoor heat standard (California Code of Regulations title 8, section 3396), applies to all indoor places of employment where the temperature equals or exceeds 82 degrees Fahrenheit *when employees are present*. Covered employers are required to maintain a written Heat Illness Prevention Plan (HIPP), train employees on heat illness, and satisfy requirements to lower the risk of heat illness incidents in the workplace.

While the motivation behind the regulation was to address indoor work areas that get hot, like warehouses, manufacturing facilities, and restaurant kitchens, it has broad application to California employers, with very narrow exceptions. The limited exceptions include:

- Prisons, local detention facilities, and juvenile facilities.
- Places of employment where workers are teleworking that are not under the control of the employer.
- Emergency operations that are directly involved in the protection of life or property.

Also, the standard does not apply to **incidental heat exposures** (i.e., quick exposures to heat). An "incidental heat exposure" is when a worker is exposed to temperatures at or above 82 degrees Fahrenheit and below 95 degrees Fahrenheit, for less than 15 minutes in any 60-minute period. However, note that you may not rely on the incidental exposure exception for the following:

- Vehicles without effective and functioning air conditioning.
- Shipping or intermodal containers during loading, unloading, or related work.

Indoor v. Outdoor Places of Employment

It is important to determine whether the work area is considered indoors or outdoors, as different standards apply.

Indoor places: are spaces that are under a ceiling or overhead covering that restricts airflow and is enclosed along the entire perimeter by walls, doors, windows, dividers, or other physical barriers that restrict airflow, whether open or closed. Generally, any workplace with a roof and enclosed sides is considered an indoor workplace.

Outdoor places: Work areas that are not indoors are considered outdoors. Outdoor places can include partial structures such as lean-tos and structures with one or more open sides.

Employers may refer to Cal/OSHA's [Comparison Chart between indoor and outdoor standards here](#). This fact sheet focuses on the indoor heat standard only.

What Must Employers Do to Comply?

Covered employers must satisfy a number of requirements, including:

- Maintaining a **written Heat Illness Prevention Plan (HIPP)**;
- **Training** employees and supervisors on heat illness;
- Providing sufficient drinking **water**;
- Providing access to **cool-down areas and breaks**;
- Developing effective **emergency response procedures**;
- Ensuring **acclimatization**.

Below, each of these requirements is explained in greater detail:

Written Plan

Employers must establish, implement, and maintain an effective written Indoor Heat Illness Prevention Plan (HIPP) that includes procedures for providing drinking water, cool-down areas, preventative rest periods, close observation during acclimatization, assessment and measurement of heat, training, timely emergency response, and feasible control measures. This plan must be individually tailored and customized to the business.

Cal/OSHA offers a [Model Plan here](#), which includes both indoor and outdoor requirements; however, employers may delete sections that are not applicable (e.g., delete outdoor sections if you have no outdoor workers). Also note, in developing the plan, the employer must ensure that employees and authorized representatives (union) have an opportunity to participate and give feedback on environmental risk factors for heat illness (e.g., workload severity and duration, protective clothing, temperature and humidity, etc.).

Staff Training

An employer must provide training to both workers and supervisors on several topics, including:

- Environmental and personal risk factors for heat illness;
- The employer's procedures for complying with the indoor heat regulation;
- The importance of frequent water consumption;
- The importance and methods of acclimatization;
- Signs and symptoms of different types of heat illness;
- The importance of workers immediately reporting signs and symptoms of heat illness in themselves or co-workers;
- The employer's emergency response procedures, such as first aid and how to contact emergency medical services with clear directions to the worksite.

Also note, prior to supervising workers, the supervisor must be trained in all of the information listed above and how to monitor and respond to hot weather reports, if the indoor work area is affected by outdoor temperatures.

For support with staff safety trainings, refer to [CEA's safety partners here](#).

Water

Employers are required to provide access to potable (fit to drink) water that is fresh, suitably cool, and free of charge. It must be located as close as practicable to the work area and cooling area. If an employer does not provide plumbed water, they are required to provide at least one quart per hour per employee per shift. For example, this would require two gallons per worker for an eight-hour shift. Employers must encourage frequent water consumption.

Cool Down Areas & Breaks

Employers must provide access to at least one cool-down area which must be maintained at a temperature below 82 degrees (unless the employer demonstrates it is infeasible), blocked from direct sunlight, shielded from other high-radiant heat sources, large enough to accommodate the number of employees on break, and located as close as practicable to the work area.

Employers must allow employees who ask for a cool-down break to take one. This is paid break time and each break must be *at least* five minutes. Employers must encourage employees to take preventative cool-down breaks, and monitor employees taking these breaks for symptoms of heat illness. If symptoms persist, the employee may not be ordered back to work.

Emergency Response

Employers must provide first aid or emergency response to any workers showing heat illness signs or symptoms, including allowing the employee to contact emergency medical services. In addition, the employer must ensure effective communication by voice, observation, or electronic means is maintained so that workers can contact a supervisor or emergency medical services when necessary.

Employers must have specific procedures to ensure that supervisors and workers are trained to recognize the signs and symptoms of heat illness, provide basic first aid (such as cooling towels and shade), obtain emergency medical services, and not allow a worker with signs or symptoms to be left alone or sent home without being offered onsite first aid or medical services. A policy describing the supervisor's responsibility and specific procedures is recommended.

Acclimatization

"Acclimatization" means temporary adaptation of the body to work in the heat that occurs gradually when a person is exposed to it. Supervisors must observe all employees for acclimatization during a **heat wave** where no effective engineering controls are in use (that is, when outdoor temperature impacts indoor temperature).

What is a heat wave? "Heat wave" means any day in which the predicted high outdoor temperature for the day will be at least 80 degrees Fahrenheit, and is at least 10 degrees greater than the average high daily outdoor temperature for the preceding five days.

Are There Additional Requirements?

When certain risk factors are present, additional requirements apply. These risk factors include:

- When the temperature reaches or exceeds 82 degrees when employees are wearing restrictive clothing or working in high radiant areas (near heat sources such as ovens, fire, boiling water, etc.), or
- Anytime the temperature or heat index reaches or exceeds 87 degrees while employees are present.

If the risk factors above apply, additional requirements include:

Heat Measurements

Employers must measure the temperature and heat index (which takes into account humidity) and record whichever is greater. Records of the temperature or heat index, whichever is greater, must be retained for 1 year or until the next measurements are taken, whichever is later, and be made available to workers or designated representatives upon request. The records must include the date, time, and specific location of all measurements.

Additional Monitoring

Employers must closely observe new employees and newly assigned employees working in hot areas during a 14-day acclimatization period.

Controls

Employers must start with feasible engineering controls, then add administrative controls and/or personal equipment, if engineering controls are not enough to reduce the temperature and heat index below 87 degrees, or below 82 degrees when the additional risk factors (as described above) are present.

Employers can learn more on [Cal/OSHA's FAQ page](#).

Final Thoughts

Cal/OSHA's latest requirement demonstrates the agency's commitment to improving workplace safety and health. A well-crafted written Indoor Heat Illness Plan and training will ensure you are not only in compliance, but will potentially lower costs associated with employee illnesses, injuries, and regulatory fines.

CEA members have unlimited calls with our HR advisors, and may call us with questions Monday-Friday, from 8am-5pm, at **800.399.5331** or email us at **CEAinfo@employers.org**!