



December 11, 2018

Texas Sunset Commission Members
Texas Sunset Advisory Commission
PO Box 13066
Austin, TX 78711

Dear Commission Members:

On behalf of the membership of the Associated Plumbing-Heating-Cooling Contractors of Texas, I would like to formally address the recent recommendations as to the Texas State Board of Plumbing Examiners (TSBPE).

As the oldest trade association representing the plumbing and hvac industry in Texas, our desire is to vehemently OPPOSE the recommendation to abolish TSBPE and move the license oversight to the Texas Department of Licensing & Regulation (TDLR).

Plumbing became a regulated occupation by the establishment of TSBPE in 1947. Its purpose is as follows:

"The mission of the Texas State Board of Plumbing Examiners (TSBPE) is to protect Texas citizens against the health and safety hazards that can result from improperly installed plumbing, gas, and medical gas systems. To protect the public's health and safety, the TSBPE ensures plumbing professionals are qualified, competent, and adhere to established professional standards."

The plumbing industry made up of masters, journeymen, tradesmen, and apprentices truly believe that a stand-alone agency can best administer the laws, rules, and enforcement that oversee the licenses and registrations they hold. Plumbers purposely go through many hours of formal and on-the-job training in order to become licensed. Due to the possible implications of a water or gas system being improperly installed, plumbers must train diligently over several years in order to become proficient at their craft. With an overall knowledge of construction, architecture, codes, and mathematical computations, a plumber will be able to correctly install water piping, natural gas lines, medical gases, and perform fixture repairs in the safest manner possible.

By moving this agency over to the larger, TDLR, the ability to oversee the laws, rules, and enforcement that will continue to keep Texans safe will diminish. Plumbers are "experts" in their field. Regulation must remain at the forefront in order to ensure that the water you drink is safe and free of any sort of contamination. It only takes a brief look at the Flint, MI water case and recent explosions of natural gas to determine the need for diligent oversight and enforcement.

Our association agrees with the Sunset staff recommendations that many issues do need to be addressed to better serve its constituents. We look forward to working with the Legislature and TSBPE staff and leadership to assist in providing more resources and input in to making the agency more proficient.

In addition to our request to allow TSBPE to continue, we would also like to ask the following:

- Fill the three positions on the TSBPE Board that will allow itself to correct the inefficiencies that exist;
- Consider ways in which the written portion of all licensing and endorsement exams can be administered electronically, across the state of Texas;
- Continue the administration of the practical examinations; the ability to demonstrate hands-on knowledge is crucial to overall knowledge and understanding

Your consideration of our requests to allow the Texas State Board of Plumbing Examiners remain intact is greatly appreciated.

Sincerely,



Alicia Dover, CAE
Executive Director