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# UA PLUMBERS LOCAL UNION No. 68

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November 26, 2018

Dear Sunset Advisory Commission Members,

I am responding to the Sunset Staff Report on the Texas State Board of Plumbing Examiners submitted to the Sunset Advisory Commission. I appreciate the time and effort put into the review by the staff and respect the recommendations laid out in the report, but I strongly disagree with most of the conclusions and recommendations stated in the report.

The Texas State Board of Plumbing Examiners is one of the oldest plumbing boards in the nation. Many other states have used the TSBPE as a model for the creation of their own plumbing boards. Admittedly, there is a shortage of licensed, qualified plumbers available, especially in the aftermath of Hurricane Harvey. However, there is also a shortage of electricians and air conditioning and refrigeration technicians, as well as many other construction trades. Regulation and oversight by the TDLR has not helped address the shortage of electricians or air conditioning technicians in the state. Placing the blame for the shortage of plumbers on the TSBPE, as stated in the report, is shortsighted and causes me to question if the report is being utilized by outside special interest groups to influence moving the TSBPE to the TDLR.

The unprecedented damage caused by the natural disasters highlighted a problem several years in the making. Our educational system many years ago abandoned the construction trades as a viable career opportunity. We are feeling the impact of those decisions which are amplified by the extreme natural disasters we have recently experienced in the state. I propose the TSBPE collaborate with the Texas Workforce Commission to address the shortage of plumbers and apprentices, especially in the areas impacted by disasters.

The report cited apprentice registrations as an unnecessary burden on the industry and I disagree. As a consumer, I want to know who is in my home or business performing work. The state apprentice registration requirement to disclose any felony convictions helps screen persons performing work in our homes, schools, and hospitals. The cost of the apprentice registration of fifteen dollars to the applicant is an investment, by the applicant, in a career opportunity and should not be viewed as a burden.

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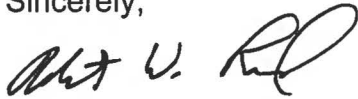
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The report is critical of the TSBPE for the cost of continuing education. The TSBPE is currently reviewing the viability of on-line continuing education classes which should make the continuing education requirement more accessible and affordable.

Some of the recommendations by the Sunset Staff Report have merit and should be considered. Many of the conclusions in the report seem to ignore factors outside of the control of the TSBPE. The TSBPE handles many complex issues and like any governmental agency, can improve on its service to consumers and the industry it serves. Moving the TSBPE to the TDLR seems to be a very extreme measure to address issues more easily resolved at the TSBPE. The TSBPE has a long history of serving the people of Texas and addressing the needs of the business community. It is my belief the citizens of the state of Texas would be better served by an independent Texas State Board of Plumbing Examiners.

Sincerely,



Robert W. Lord  
Business Manager  
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