

**From:** [Sunset Advisory Commission](#)  
**To:** [Janet Wood](#)  
**Subject:** FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Friday, June 27, 2014 1:35:06 PM

---

-----Original Message-----

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Friday, June 27, 2014 9:36 AM  
To: Sunset Advisory Commission  
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Friday, June 27, 2014 - 09:36

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Rick

Last Name: Anderson

Title: Principal Engineer

Organization you are affiliated with: EFI Global, Inc.

City: Houston

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or Opposed:

I am a licensed mold assessment consultant in Texas and there are several others licensed in my company along with the company itself. I am against this elimination of the mold regulations.

1. No liability insurance will be required for contractors or consultants doing this work.
2. No training of any kind will be required to say you can do this work.
3. We will end up back of the days of panic, and over exaggeration of the mold work by unqualified consultant and contractors exploiting unknowledgeable customers, especially homeowners. Anybody can open up a business claiming to be a mold expert who has no business doing the work.
4. Clients and Consumers will have no protection or complain process for contractors and consultants who do not do their work properly or cause damages to property. More contamination and damage can occur than was originally there if the work is not performed properly.
5. Clients will not have any certified/qualified documentation proving successful remediation when buying or selling property/homes.
6. The mold industry is just getting over the hysteria and exaggeration work that was done in the early 2000s. There is actually respect in the industry now by consumers and clients.
7. The EPA may provide mold remediation guidance documents for consumers, but they provide guidance documents for all kinds of things that are just guidelines and not required to be followed. There is a right way and a wrong way to do mold assessments and remediation.
8. There are all kinds of training classes and seminars available for mold assessors and remediation contractors, but the consumer doesn't have any idea which ones they should ask for in whoever work for them.

9. DSHS is handling the enforcement of the mold regulations in a fair and reasonable way. I am not aware of many complaints from the individuals who are licensed by the state. For the small amount of resources required to manage the mold program, there is a lot of good to be done by maintaining this program.

Any Alternative or New Recommendations on This Agency: Eliminate the requirement for mold assessment technician, and mold remediation worker. the most important people to be licensed in this industry is the mold consultant and remediation contractor. They are then responsible for doing the work right. this would reduce resource need at DSH and still keep the effectiveness of the program.

My Comment Will Be Made Public: I agree