

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Thursday, June 19, 2014 5:06:42 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Thursday, June 19, 2014 5:01 PM
To: Sunset Advisory Commission
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Thursday, June 19, 2014 - 17:00

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Kyle

Last Name: Dotson

Title: Certified Industrial Hygienist

Organization you are affiliated with: DOTSON Group, LLC

Email: kyle@dotsongroup.com

City: Los Altos Hills

State: California

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

I support your sunset and elimination of the DSHS mold assessment and remediation program.

While serving on the American Industrial Hygiene Association Board of Directors, I provided testimony before the Texas Senate Business & Commerce Committee in Austin, TX, on 9/4/2002 and 2/25/2003. The AIHA provided recommendations at that time for what became the DSHS mold assessment and remediation program. However, in these current comments I am speaking as an independent Certified Industrial Hygienist; not for the AIHA.

There is no longer a need for this DSHS program; in fact it could be easily argued that the existence of the program has become counterproductive. It is telling that many competent Certified Industrial Hygienists elect not to provide residential mold services or even any residential indoor air quality services at all due to programs such as this DSHS program. Since the program began, many issues regarding mold in buildings have been well defined and today are no longer well represented by this program that was locked-in by the enabling legislation before many such issues were well-defined.

More recent work recommends better approaches to mold in buildings. I am the lead author of Assessment, Remediation, and Post-Remediation Verification of Mold in Buildings, an Industry Guideline publication of the American Industrial Hygiene Association, September 2004. Other even more recent publications are also available from AIHA regarding the topic of mold in buildings.

As recognized in the Sunset Advisory Commission staff report dated May 2014, professional services are available in Texas from members of the AIHA, and indeed many competent Certified Industrial Hygienists reside in Texas. Such professionals can be found on the Consultants Listing at www.aiha.org.

Any Alternative or New Recommendations on This Agency: Superior services are available in Texas from the many competent Certified Industrial Hygienists that reside in Texas. DSHS could best represent Texas residents and best protect Texas consumers by referring them to the Consultants Listing at www.aiha.org.

My Comment Will Be Made Public: I agree