

**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 1:45:21 PM

---

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Thursday, June 19, 2014 10:51 AM  
To: Sunset Advisory Commission  
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Thursday, June 19, 2014 - 10:50

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Homer

Last Name: Holder

Title: owner

Organization you are affiliated with: SWK LLC

City: Blanco

State: Texas

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

I hold a Mold Assessment Consult license and I oppose the discontinuation of the TMARR for several reasons, including but not limited to:

- 1) Mold is a public health issue. The scientific literature clearly show that mold exposure can be a significant health risk to certain individuals, especially the elderly, the very young, the sick, and those with any auto-immune disease.
- 2) Structures that house/service those at risk individuals are, in more instances than not, managed by entities that are not sufficiently trained to identify and deal with mold properly on their own and/or driven by budget to cut corners. Those structures of particular concern would include but not be limited to hospitals, nursing homes, day care, health care, schools, jails, office buildings, and other public access buildings.
- 3) The licensing of mold activities was essential in stopping abuse to the consumer by non-qualified, non-insured, and opportunist self-proclaimed experts. Discontinuing this program could resurrect the "wild west" environment of the past.
- 4) The "Certificate of Mold Remediation" required by TMARR is an vital document to assure the consumer that the job has been done and overseen properly and furthermore, is essentially the only proof for retained property value of real estate with a mold history in disclosure for real estate transactions.
- 5) Mandatory training, proof of qualifications, proof of experience, and licensing is the only way to "assure" an acceptable methodology for protecting public health concerning mold.
- 6) Discontinue the TMARR and all mold training for workers will cease. Only professionals such as CIHs will have a clue. CIHs have no authority. The TMARR sets requirements for responsibility, authority, and accountability for the protection of public health.
- 7) The TMARR is an especially essential program for hospitals, nursing homes, day care, health care, schools, jails, office buildings, multi-family dwellings, and other public access buildings because it is for the protection of public health.

8) If the TMARR is discontinued, they why not discontinue Plumbing, Electrical, and HVAC licensing as these license programs also have the sole purpose of protecting public health.

Any Alternative or New Recommendations on This Agency: none

My Comment Will Be Made Public: I agree