

**From:** [Sunset Advisory Commission](#)  
**To:** [Janet Wood](#)  
**Subject:** FW: Texas Mold Assessment and Remediation Rules  
**Date:** Monday, June 30, 2014 8:46:29 AM

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**From:** Cole Stanton  
**Sent:** Monday, June 30, 2014 8:43 AM  
**To:** Sunset Advisory Commission  
**Subject:** Texas Mold Assessment and Remediation Rules

The Indoor Air Quality Association (IAQA) promotes uniform standards, procedures and protocols in the indoor air quality industry. IAQA is the premier organization dealing with IAQ issues in the U.S. and around the world, has thousands of members involved with mold, and includes members throughout Texas whose businesses are involved with mold assessment and remediation every day.

IAQA invited our members in Texas to provide the organization with their feedback concerning the proposal from the Texas Sunset Advisory Commission to deregulate Texas Department of State Health Services (TDSHS) oversight of the mold assessment and remediation industry by discontinuing the Texas Mold Assessment and Remediation Rules (TMARR). Over 90% of Texas IAQA member respondents oppose the deregulation plan. Our members were very emphatic in their opposition, and many provided a number of ideas that might provide substantial improvement to the existing system in Texas.

IAQA agrees with the consensus of our members/businesses in Texas, and opposes the deregulation proposal. We urge the Sunset Advisory Commission to withdraw the proposal, and IAQA submits the following comments for consideration:

- It is IAQA's position that the process leading to the proposed deregulation thus far has been too rapid, and has lacked sufficient notification and involvement of the Texas businesses that are the practitioners of assessment and remediation of mold. A more extensive and robust discussion and debate is required for adequate decision making.
- It is also our position that some of the rationales for deregulation cited are not accurate. The U.S. Environmental Protection Agency does not provide guidance that is as thorough as existing industry standards, and EPA guidance is targeted to schools and public buildings, but lacks a residential component. The AIHA is not a certification organization, and while the ABIH provides the CIH credential that has some applicability to assessment, neither AIHA nor ABIH provide a certification for the remediator.
- IAQA proposes that the current regulatory system be improved rather than abandoned. As noted, the respondents among IAQA's membership in Texas proposed several thoughtful improvements to the current system. Noteworthy were suggestions to ease and simplify qualification and continuing education requirements. Texas has an opportunity to both ease the burden on TDSHS and increase industry participation by adopting elements of licensing programs in states where well-established training and credentials from industry associations are applicable toward or can satisfy qualification criteria. Another improvement could be the creation of a mechanism (such as a panel with public/private membership) that could provide for easier modification of the mold regulations to remove elements that become obsolete or archaic.

The IAQA Government Affairs Committee is ready to provide any possible assistance and expertise to any interested agency or entity involved with mold and mold regulation in Texas. We are willing to facilitate discussion, supply communication to practitioners, and participate in the development of an

improved system. IAQA firmly believes this is an opportunity to create a better system when it comes to mold in Texas, and a revised or unchanged regulation is preferable over no system at all.

**The Indoor Air Quality Association (IAQA) Mission Statement: “IAQA is dedicated to bringing practitioners together to prevent and solve indoor environmental problems for the benefit of customers and the public.”**

For more information visit [www.iaqa.org](http://www.iaqa.org), call (301) 231 -8388 or email [info@iaqa.org](mailto:info@iaqa.org)

**From:** [Sunset Advisory Commission](#)  
**To:** [Janet Wood](#)  
**Subject:** FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Monday, June 30, 2014 4:46:56 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Monday, June 30, 2014 12:19 PM  
To: Sunset Advisory Commission  
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Monday, June 30, 2014 - 12:19

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Cole

Last Name: Stanton

Title: Government Affairs Chairman

Organization you are affiliated with: Indoor Air Quality Association (IAQA)

City: Andover

State: Massachusetts

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

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Any Alternative or New Recommendations on This Agency:

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My Comment Will Be Made Public: I agree