

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 1:50:13 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Thursday, June 19, 2014 11:36 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 - 11:36

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Emil

Last Name: Studinka

Title: Licensed Mold Assessment Consultant, Certified Industrial Hygienist, Certified Safety Professional

Organization you are affiliated with: Practicing private health and safety professional in the state of Texas - not voicing the the opinions of my employer

City: Marble Falls

State: Texas

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

Firstly, I applaud the Sunset Commission's efforts to improve our governing entities such as DSHS - for the benefit of all Texas stakeholders. It's apparent that much work and thought has gone into the DSHS report. Regarding the Sunset commission's recommendation to discontinue the Mold Program section within DSHS, I believe this is not in the best interest of the public health for Texas. The DSHS Mold branch is not perfect and could likely be improved and become more focused and less prescriptive, but I believe the licensing of this industry benefits all who may be exposed to indoor mold.

Without some degree of regulation and standards of care - enforced by this agency, the potential for unscrupulous practices will likely be an unintended consequence - without any presence of law.

Note: the Sunset Commission has stated that the AIHA, a national entity provides certifications for assessors. To my understanding, this is not an accurate conclusion; AIHA is a membership body for practicing industrial hygienists and there is no "mold certification process" or program within AIHA. Regarding the reference to the EPA, the EPA provides mold guidance without any regulatory "teeth"(in the area of indoor air quality) - it simply provides information for practitioners and for the public - a good source, but not sufficient to regulate the industry. There are no other regulating or licensing governmental bodies at present that regulate this industry to help ensure the public's health interests are considered.

The presence of mold growth sites in public and private buildings is fairly common. It poses a recognized health issue to those susceptible; as an allergen, as an asthma trigger, and potentially an opportunistic pathogen (certain species) to compromised individuals. Other potential health effects are arguably a consideration to not discount. Without regulation and required practices governing remediators, assessors, trainers, and laboratories, I believe the

public health will be degraded if rules are not in place, and encourage the S.C. to reconsider their position and the legislature to continue this program within DSHS.

Thank you for the opportunity to comment.

Sincerely,

Emil Studinka, CIH, CSP, MAC

Any Alternative or New Recommendations on This Agency: I would encourage a streamlining and less prescriptive approach going forward which, in turn should help with DSHS internal efficiencies and overall effectiveness.

Possibly a sub-group of practicing professions could contribute to this effort to achieve a more viable process that meets SC voiced concerns without "throwing the baby out with the bath water".

My Comment Will Be Made Public: I agree