



2020 SESSION POSITION PAPER - LETTER OF CONCERN

BILL: HB 7 – Environment – Public and Nonpublic Schools – Inspections for Mold Hazards and Mold or Moisture Problems

COMMITTEE: Ways and Means Committee

POSITION: Letter of Concern

BILL ANALYSIS: HB 7 would require the Department of the Environment (MDE), in consultation with other state agencies, to adopt regulations requiring periodic inspections for the presence of mold hazards, mold, or moisture problems in each public or non-public school in MD. Before adopting regulations, MDE must research current related practices and procedures that should guide the development of regulations which will outline a process for inspections, notifications, receiving public input and addressing concerns, establishing a stakeholder group and reporting activities.

POSITION RATIONALE: The Maryland Association of County Health Officers (MACHO) is a consistent champion of child and adolescent health. Although we applaud the sponsor’s aim of improving indoor air quality, because of a lack of accompanying funding, HB 7 will place unattainable mandates on local health departments (LHDs).

Responsibilities placed on MDE to perform regular inspections for moisture and mold, certify laboratory testing, perform re-inspections after remediation, respond to local complaints, train staff to properly perform new tasks, and develop new databases, will almost certainly be delegated to LHDs. LHDs are already underfunded and severely understaffed to handle their present environmental health requirements including restaurant inspections, well and septic inspections, emergency response duties, and a host of other services important to the health and safety of our communities.

Adding school moisture and mold responsibilities to LHDs will require over 50 new positions statewide, technical training in a field unfamiliar to our staff, and increased responsibilities for already over-tasked local supervisors. As public health professionals, we take our responsibilities seriously. It is demoralizing when we lack the resources to carry them out to the level of quality we expect of ourselves.

Considerations for improved health and environmental conditions in all of the state’s schools should be an ongoing portion of broader education reform. LHDs value these efforts as we aim to improve the well-being of children in our communities. As future improvements are considered, MACHO advocates for dedicated allocation of accompanying resources to properly meet all state agency mandates.

For these reasons, the Maryland Association of County Health Officers submits this **letter of concern** for HB 7. For more information, please contact Ruth Maiorana, MACHO Executive Director at rmaioral@jhu.edu or 410-614-6891. *This communication reflects the position of MACHO.*