



March 19, 2025

Assembly Environmental and Transportation Committee
100 State Circle
Annapolis, Maryland 21401
RE: SB 856

Dear Chairman,

On behalf of the Institute of Inspection, Cleaning, and Restoration Certification (IICRC), I would like to provide you with some information regarding mold assessment and remediation as it relates to Senate Bill 856.

The IICRC is a globally recognized, ANSI-accredited standards developing organization that has been working, since 1972, to establish the standards of care for the cleaning, inspection, and restoration industries. To that end, the IICRC has developed the only accredited mold remediation standard: The ANSI/IICRC S520 Standard for Professional Mold Remediation. Additionally, industry experts are in the process of developing the S530 Standard for Indoor Environmental Assessment for Suspected Mold Contaminated Structures.

SB 856 directs the Department of the Environment, in consultation with other agencies, to establish uniform standards for mold assessment and remediation. In doing so, they must establish standards in accordance with standards from the American Industrial Hygiene Association, American Indoor Air Quality Council, and other nationally recognized accreditation industries that are independent of trade associations. However, no similar requirement is outlined for mold remediation. Instead, the bill directs the Department to base remediation standards solely on the U.S. EPA's Mold Remediation in Schools and Commercial Buildings guidelines from 2008.

Rather than developing entirely new standards based on guidelines which have not been updated in nearly twenty years, we encourage the committee to amend SB 856 to incorporate existing, accredited industry standards, such as the ANSI/IICRC S520. This approach would allow Maryland to implement effective, science-based standards quickly, ensuring the protection of tenants and their health without unnecessary delays. Moreover, amending the language in this way would promote consistency throughout the legislation, as Section 8-121(C)(3) already requires a landlord to assess and remediate mold in accordance with recommended industry guidelines and practices, which is the S520 Standard.

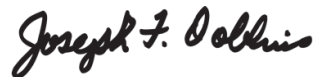
Maryland already uses multiple ANSI-accredited standards throughout its regulatory code, including for the performance of duties in Maryland leased facilities, demonstrating the state's recognition of the importance of such standards.¹ By following this precedent, Maryland can rely on already established standards rather than duplicating efforts or delaying necessary protections for public health.

¹ Maryland Department of General Services. *General Performance Standards and Specifications for the State of Maryland Lease Facilities*,
<https://dgs.maryland.gov/Documents/RealEstate/StandardsandSpecifications.pdf>.

The IICRC welcomes the opportunity to collaborate with the committee and provide any necessary information to support the adoption of well-established industry standards. Ensuring that the state relies on accredited standards will lead to more effective and immediate solutions to protect public health and indoor air quality.

Please feel free to reach out to my staff should you have any questions or wish to discuss this further. We appreciate your time and dedication to improving indoor air quality for Maryland residents.

Sincerely,

A handwritten signature in black ink that reads "Joseph F. Dobbins". The signature is written in a cursive style with a large, stylized 'J' and 'D'.

Joe Dobbins, President/Chairman of the Board
Institute of Inspection, Cleaning, and Restoration Certification (IICRC)