



**2020 SESSION
POSITION PAPER**

BILL: HB 1428 – Environment – Higher Education Facilities – Mold Hazards and Mold or Moisture Problems

COMMITTEE: Appropriations Committee

POSITION: Letter of Concern

BILL ANALYSIS: HB 1428 would require the Department of the Environment, in consultation with other agencies, to adopt regulations requiring periodic inspections for presence of mold hazards and mold or moisture problems in each higher education facility in the state, collect information about current inspection processes, establish exposure limits for indoor concentrations of mold and mold spores, procedures for inspection, inspection of facilities by July 1, 2021, submission of inspection results to entities, including local health departments, and require remediation activities.

RATIONALE: The Maryland Association of County Health Officers (MACHO) is a consistent champion of student health. Although we applaud the sponsor's aim of improving indoor air quality, because of a lack of accompanying funding, HB 1428 will place unattainable mandates on local health departments (LHDs), and therefore, we provide a **letter of concern**.

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 higher education facility moisture and mold responsibilities to LHDs will require significant increases in number of personnel, 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.

LHDs value efforts to improve health and environmental conditions in the state's higher education facilities. 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 1428**. For more information, please contact Ruth Maiorana, MACHO Executive Director at rmaiora1@jhu.edu or 410-614-6891. *This communication reflects the position of MACHO.*