

**From:** [Sunset Advisory Commission](#)  
**To:** [Trisha Linebarger](#)  
**Subject:** FW: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Monday, November 26, 2018 12:30:40 PM

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

From: sunset@sunset.texas.gov <sunset@sunset.texas.gov> On Behalf Of Texas Sunset Commission  
Sent: Monday, November 26, 2018 12:27 PM  
To: Sunset Advisory Commission <Sunset@sunset.texas.gov>  
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: TEXAS STATE BOARD PLUMBING EXAMINERS

First Name: Thomas

Last Name: Rice

Title: President and Responsible Master Plumber

Organization you are affiliated with: Trade Professionals Network

Email:

City: Houston

State: Texas

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

In response to Issue 1 item 1.1:

Whether the TSBPE or the TDLR is running the plumbing industry, I think the entity needs to be adequately funded to appropriately staff and administrate to the needs of what the industry needs and is demanding. We need more plumbers, which mean less barriers to entry into the trade, more examinations, more licenses issues, more people to provide continuing education and more staff receiving and organizing all of this information.

All of these things require more resources and streamlining/outsourcing will only go so far toward that end.

Allowing the board to use more of the funds it raises would have helped to a degree.

In response to Issue 2 item 2.2:

Eliminating Direct Supervision statutory requirements. Get with the times.

Medical school lectures, even surgeries are "supervised" remotely from continents away to meet the need of their industry. Texas Tech had one campus for Allied Health Sciences, but the schools weren't meeting demand for nurses, PT's, OT's and other therapists. They opened three more schools on other campuses, set up giant monitors at the front of the room and required everyone to come to class with laptops. The prof taught via live remote from one campus and rotated around between four campus for teaching and counselling. All communication was done electronically, the kids had the lecture recorded. If they didn't attend the lecture and check in via wifi, they couldn't watch the recorded lecture without reading the material and passing a quiz to unlock the lecture. The medical community figured this out in the 1990's. They quadrupled their qualified graduates without increasing staff. With Facetime, interactive websites, Email, text and GPS tracking of employees, we know where our guys are, what they are doing and can see/interact with them while they are doing it from anywhere. Standing next to them, or even being within eyesight of them isn't necessary for them to do their job with supervision.

In response to Issue 2 item 2.4:

After removing the boundary of a Diploma or GED for taking the journeyman exam, the next step is making the

exam more available to take. I hold or have held Masters Plumbing licenses in Louisiana, Oklahoma, Colorado, North Carolina, South Carolina and Virginia. My business partner holds Texas and Alabama. Many states waved proof of experience, but required us to take the steps of going through the Journeyman and Masters exams. With more broad experience than most in this regard, I can say that most states do not have a practical component to their exams and furthermore, Texas and Louisiana are the only two exams I took on actual paper with pencil. With current technology, videos, 3D photography, there is no need for a practical component. Everything can be shown, modeled or described on a computer screen and given as a proctored exam anywhere. Outsourcing to a proven provider of Plumbing licensure testing is a given. If a practical requirement is maintained, streamline it to one challenging aspect of plumbing as Colorado has done with brazing large diameter copper tubing and forming a sizing project to fit parameters to solve a problem. If you can do that, you are capable of learning anything. The written exam can and should be administered online. If the practical remains a requirement, upon passing the written portion then a Colorado style practical could be administered with a 1 hour timed duration. Two examiners can administer the practical for an hour, then grade for an hour, turning over 4 X as many practicals a day with same day pass/fail results.

Any Alternative or New Recommendations on This Agency:

I attended the TSBPE board meeting following the report. Prior to going through the report item by item, an interesting point was made by the staff attorney that I was unaware of.

The requirement of a Highschool Diploma or a GED to take a Journeyman's plumbing examination is a Board Rule, NOT a statute of licensing law.

Further he stated that only two states in the US had this requirement, Texas and Massachusetts. I think removing this barrier to taking the journeyman plumbing examination is a logical step toward allowing more people the opportunity to make a living in the profession. If they want to keep the requirement in for the Masters license, that would be acceptable but the industry needs more licensed journeyman now. There are many mechanically inclined middle school and high school dropouts with passable math and science skills, who can't pass their foreign language requirement to matriculate or couldn't break down a sonnet. The school system forces these kids out and labels them losers. The trades are a place where they can thrive, develop as people, have a purpose and provide a service to their community while making an excellent living. Elimination of this Board Rule needs to happen immediately.

An additional recommendation that is not included in the staff report is the benefit of adopting only one code for use in the state of Texas. Because dual codes are referenced in the rules, the agency is forced to develop tests that meet the requirements of both the International Plumbing Code (IPC) and the Uniform Plumbing Code (UPC) which is not only an administrative burden, it adds yet another hurdle to obtaining a plumbing license by forcing candidates to learn a code that is not widely adopted or enforced in this State. The Uniform Plumbing Code does not correlate with the other building codes in Texas. Accepting one widely-accepted standard plumbing code, the International Plumbing Code, would create additional efficiencies in the licensing process.

My Comment Will Be Made Public: I agree