

From: [Sunset Advisory Commission](#)
To: [Trisha Linebarger](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Monday, December 10, 2018 8:08:14 AM

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

From: sunset@sunset.texas.gov <sunset@sunset.texas.gov> On Behalf Of Texas Sunset Commission
Sent: Sunday, December 9, 2018 9:52 AM
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: Dianne

Last Name: Villarreal

Title: Licensed Plumber & Licensed Plumbing Inspector

Organization you are affiliated with:

Email: dianne@a-aces.com

City: Fate

State: Texas

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

I declare my support of the Texas State Board of Plumbing Examiners and for this agency to remain a stand-alone agency.

After reading Staff's Report, it's apparent an unbiased audit was never performed. I hope this Commission has recognized the extreme prejudice of Staff's Report as well and will review the Texas State Board of Plumbing Examiners with a fair and open-mind.

Response to recommendations:

- 1.1 Absolutely Disagree - Plumbing is a life sustaining profession not a profession of comfort or entertainment. Unlike the TSBPE, the TDLR does not have the experienced knowledgeable personal to administer, exam or license a profession that's sole responsibility is to sustain life.
- 1.2 Agree with exception - This can be accomplished at the TSBPE, with the proper financial support from the legislature. The same financial support that would be necessary for any other agency assigned this task.
- 1.3 Agree - It would be beneficial for all state agencies to have a Memorandum of Agreement to work closely together on common issues.
- 2.1 Disagree - Present legislation mandates these 3 registrations. However, redesigning the plumbing law would better serve the plumbing industry's needs and allow the TSBPE to streamline the process while maintaining the same benefits presently provided.
- 2.2 Disagree - Suggesting that having enough insurance will handle any and all failures justifies leaving apprentices without direct supervision is ludicrous. The court systems will fill up with lawsuits. For decades, direct supervision has been the primary educational tool for an apprentice to learn the basic principals to ensure safe drinking water, safe sanitary, medical and natural gas installations. Knowledge of proper materials, proper installations of the materials and fundamentals for safe plumbing installations has kept Texans safe for well over a century. Presently, there are many tasks that do not require direct supervision. Perhaps the TSBPE could list these

tasks in the Board Rules for clarification.

2.3 Agree with exception - The front-line examiners should be licensed plumbers. If the needs of the examinee and the plumbing industry are truly of concern, then it would be detrimental to the licensing process to remove the professional help and assistance which has been provided by the "licensed" examiners for decades. With that being said, perhaps not all those who work in examinations would need to be licensed. Allow the TSBPE the flexibility to evaluate the situation.

2.4 Disagree - We're not talking about a bad haircut or a used car part that was placed in the wrong recycle bend. I mean no disrespect to any occupation but only wish to express that the plumbing profession is a life sustaining profession. It is essential for the TSBPE to control the written exam and the practical exam to periodically update these exams to keep with industry advancements while ensuring the health and safety of our citizens.

The examinee must demonstrate their knowledge and ability to install safe plumbing installations during this direct and brief exam. The TSBPE can evaluate the difference avenues available to administering the written exam and possibly the practical exam if the financial support is provided.

2.5 Agree - Continuing Education could stand an overhaul. However, providers, instructors and courses must meet some level of requirements or you'll have chaos. The TSBPE can update and streamline this process.

2.6 Agree - The renewal process could benefit from a review and benefit both the agency and the plumbing industry.

2.7 Agree - Streamlining would benefit the agency and the plumbing industry.

2.8 Agree with exception - The suggested "plumbing contractor" licensee would simply replace the present "RMP" designation with all other requirements still required.

2.9 Agree - We presently have a "Provisional Journeyman's" license but with proper requirements, a temporary license could be created. I'm not sure what benefit it would have to the public to allow a person with not credentials to obtain a "temporary license".

2.10 Disagree Strongly - I will repeat... It is essential for the TSBPE to govern the construction and maintenance of the written and practical portions of the various plumbing exams. The examinee must demonstrate their knowledge and ability to install safe plumbing installations during this direct and brief exam.

2.11 Disagree - However, a realignment of the CPE course year and the renewal expiration dates is needed to clarify and offer all licensees and registrants proper opportunity to fulfill their renewal requirements.

3.1 Disagree - Qualified licensed field investigators, along with licensed

Plumbing Inspectors, are essential to the protection of the citizens life safety concerns. The reports reference that a field investigator does not need to be licensed or have previous plumbing training or experience is ludicrous. Remember, we're referring to the last line of defense to insure our citizens life safety.

3.2 Agree - The Enforcement Committee could be redesigned to help with efficiency. However, the TSBPE has already made great advances with this concern.

3.3 Agree - Cease and Desist system is a better fit for the TSBPE.

3.4 Agree - The TSBPE presently has a prioritization system, however the agency could review the present system and establish rules to better outline the process.

3.5 Agree - This could be combined with recommendation 3.4.

3.6 Agree - It is my understanding that the TSBPE has been working on a system to simply state there has been action with the licensee. However, financial issues have slowed the actual implementation.

The Texas Plumbing Industry has performed our responsibilities with the highest regards for the lives and safety of every citizen of Texas. Even though most citizens take their drinking water, sanitation systems, and natural gas systems for granted, the professional licensed plumbers of Texas do not. We are the front-line defenders to prevent deceases such as cholera, typhoid, SARS, and legionella, just to name a few.

Please declare to all citizens of this great state that this commission recognizes and embraces it's duty and responsibility to ensure the quality of life that we have enjoyed for decades will continue through the guidance of the Texas State Board of Plumbing Examiner as a stand-alone agency and the plumbing industry of Texas.

Any Alternative or New Recommendations on This Agency: As previously stated--for the health and safety of the State of Texas, the TSBPE must remain a stand-alone agency with the proper moral, ethical and financial support of

our State's leadership.

My Comment Will Be Made Public: I agree