



**City of Portland, Oregon**  
**Bureau of Development Services**  
**Property Compliance**  
FROM CONCEPT TO CONSTRUCTION

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To: Rental Services Commission  
From: Beth Benton, Property Compliance Division Manager  
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**Title 29 - Property Maintenance Regulations**  
**Proposed Draft Amendments Summary**

This summary is intended to highlight and provide updates for the recommendations made in 2008 by the Quality Rental Housing Workgroup (QRHW) to ensure that all housing in Portland, especially rental units, is safe and healthy. Only those recommendations listed in the September 22, 2008, report that are relevant to the work the Bureau of Development Services (BDS) has jurisdiction over or whereby BDS staff have the authority to implement or to recommend changes are addressed in this document.

This Summary is broken down into 4 sections:

1. Historical Timeline for reference, including proposed timeline for adoption and implementation pg 2
2. Abbreviated list of QRHW recommendations from 2008, applicable to BDS, including updates or clarifying information pg 3 - 4
3. Cross-Referenced Summary of proposed Title 29 amendments to applicable sections to the QRHW recommendations pg 5 - 10
4. Additional reference data & info. (*Lead references; EPA requirements for RRP; Mold information*) pg 11 - 13

### Historical Timeline

Sept 22, 2008	Quality Rental Housing Workgroup presented recommendations to City Council, including amendments to Title 29
Sept 29, 2008	National Housing Market collapse – National Economic Recession began
Dec 2009	Due to the recession, development and construction activities plummeted – BDS began layoffs - down to 4 Code Enforcement Inspectors
Jan 2010	Enhanced Rental Improvement Program (ERIP) began as a targeted area pilot
July 1, 2013	In response to an improving Portland economy and housing market, BDS began hiring for multiple positions and growing staff to meet demand.
Oct 25, 2017	Rebecca Esau became new Director of BDS and began a total reorganization and prioritization of divisions in this Bureau which took a year to complete.
Jan 1, 2018	Staff began reviewing prior recommendations of the QRHW, meeting with Commissioner Eudaly and researching various technical aspects of the QRHW recommendations in order to begin moving amendments to Title 29 forward.
Aug 16, 2018	Staff began a series of meetings with Industry and professional, technical Subject Matter Experts (SMEs) and Multnomah Health Dept regarding amendments to Title 29 in regard to mold, lead-based paint, and pest management for technical discussions and best practices.
April 2, 2019	BDS Property Compliance staff completed their review and finalized their proposed, draft amendments of Title 29.
May 21, 2019	BDS presents first overview of proposed, draft amendments of Title 29 to the Rental Services Commission, as representatives of various Housing Stakeholders, for discussion, feedback, and comments.

## Abbreviated List of QRHW Recommendations from 2008 Report, Applicable to BDS, Including Updates

### **I. (QRHW) Code Change Recommendations**

1. Distinguish in Code between rental housing and owner-occupied housing. **(see pg 5)**
2. Define lead hazards in Title 29, require remediation using safe work practices and increase lead awareness among tenants and property owners. **(see 2019 proposed amendments to Title 29 – pg 6)**
3. Provide standards and education for effective remediation and prevention of pest infestation and sanitation violations. **(see 2019 proposed amendments to Title 29 pgs 7 - 8)**
4. Amend the City of Portland Maintenance Code to more precisely define and eliminate excessive moisture that creates conditions conducive to mold growth. **(see 2019 proposed amendments to Title 29 – pg 9)**
- ~~5. Increase tenant accountability for habitability~~
- ~~6. Support policy changes related to enforcement of new Code language.~~
7. Provide training and equipment related to enforcement of new Code language. **BDS is committed to providing necessary training for staff. However, the need for specialized training for lead inspections and mold sampling, etc will be managed by other licensed contractors, as necessary or required and not by BDS staff enforcing Minimum Property Maintenance Regulations.**

### **II. (QRHW) Enforcement Recommendations**

#### A. Adequate and Stable Funding for Neighborhood Inspections

1. Increase allocation of funds for inspection services. **BDS staff will be assessing this recommendation later this year for consideration with the FY2020/21 budget proposal.**
- ~~2. Adopt a time limited per unit fee to fund implementation of recommendation.~~
3. Restructure fines for non-compliance with Title 29. **The last increase in enforcement fees and fines was in 2013. Currently the BDS Finance team has proposed another increase in enforcement fees and fines for the FY2019/20 which is being presented to Council along with our annual budget.**
4. Strengthen collections. **Billing and Collections are handled by the Finance Division (OMF) of the Bureau of Revenue and Financial Services.**

## B. Improve Enforcement Tools

1. Adopt the Enhanced Complaint Model for inspections. Modeled after the recommendations of the QRHW, an Enhanced Rental Inspection Program (ERIP) pilot program was created in 2010. Since then the ERIP program has operated since its launch, on a voluntary basis without issue. However, Title 29 was never amended to provide enabling language for the ERIP program to be mandatory.  
**UPDATE: (see 2019 proposed amendments to Title 29 – pg 10)**
2. Consistently implement Code hearings policy. BDS staff have been taking more Nuisance and Extremely Distressed Property Program (EDPEP)(Housing) cases to Hearing each year for further enforcement under Title 29 cases. BDS is projecting at least 13 cases will be sent to Hearing in the 2019/20 fiscal year.
- ~~3. Eliminate the Business License provision that exempts properties of 9 or fewer units~~

## C. Establish a Solid Understanding of Incidence and Impacts of Retaliation.

- ~~1. Require landlords to send copies of all termination notices to the City of Portland once the tenant has requested an inspection~~
- ~~2. Study the incidence of retaliation in coordination with legal assistance to qualified tenants~~

## III. Education Recommendations

- ~~1. Implement a grassroots education campaign for landlords and tenants.~~
- ~~2. Develop and implement training modules to bring essential rental education to the community.~~
3. Leverage existing systems as distribution points for landlords and tenant educational resources. BDS staff have been and plan to continue the distribution of educational materials related to healthy housing topics to tenants, landlords and homeowners during the course of their inspections and along with required mailing(s) of notices.

## IV. (QRHW) Recommendations for Public Transparency

- ~~1. Establish a Stakeholder Advisory Committee for Neighborhood Inspections~~
2. Make code enforcement policies and outcomes publicly accessible via a user-friendly Portland Maps interface. Currently all enforcement cases and permits are available for review via Portland maps. BDS Technology & POPS teams have been working on and are planning for greater public access as part of a much larger, software system upgrade and product improvement, which is in process now and scheduled for roll-out later this year.

## Cross-Referenced Summary of Proposed Title 29 Amendments

### **1. QRHW: Distinguish in Code between rental housing and owner-occupied housing.**

Title 29 is a "minimum standard" for the maintenance of all properties and existing structures throughout the city of Portland.

Copy of current Code purpose and scope:

#### **29.05.020 Purpose.**

(Amended by Ordinance No. 182488, effective February 21, 2009.) The purpose of this Title is to protect the health, safety and welfare of Portland citizens, to prevent deterioration of existing housing and the exterior of non-residential structures, and to contribute to vital neighborhoods by:

- A. Establishing and enforcing minimum standards for residential structures regarding basic equipment, facilities, sanitation, fire safety, and maintenance.
- B. Establishing and enforcing minimum standards of maintenance for outdoor areas and adjacent rights of way.
- C. Regulating and abating dangerous and derelict buildings.
- D. Establishing and enforcing minimum standards for the exterior maintenance of non-residential structures.

#### **29.05.030 Scope.**

(Amended by Ordinance No. 180330, effective August 18, 2006.) The provisions of this Title shall apply to all property in the City except as otherwise excluded by law.

**BDS:** No code changes are recommended by BDS for this section of Title 29, at this time.

The main purpose of Portland City Code Title 29 is to protect the health, safety and welfare of every resident of Portland.

Any difference between a rental property and an owner-occupied property with regard to the enforcement of code (specifically Title 29) would be in the definition of each type of dwelling, and then only in reference to the enforcement program(s) administered under the authority of the code, or those actual differences that exist in the construction and use of the different type of structures. (ie single-family versus multi-family versus hotel).

**BDS Property Compliance staff agree there needs to be the ability to identify within case data, rental units versus owner-occupied units, for reporting purposes. The ability to easily identify and export case data by rental or owner-occupied sub-type was not created when the platform/database program we are using was originally setup for BDS enforcement use.**

#### **In Process:**

- **Currently, BDS is in the middle of a multi-phased Software Platform upgrade and we are not able to request any upgrades during this time of transition.**
- **Property Compliance staff are exploring additional processes we can implement sooner, to allow us to break out other case specific data.**
- **Our goal is to begin tracking rental /owner case data during the FY2019/20.**

**2. QRHW: Define lead hazards in Title 29, require remediation using safe work practices and increase lead awareness among tenants and property owners.**

Proposed Title 29 Amendment(s):

**29.30.260 Hazardous Materials.**  
(Amended by Ordinance No. 180330, effective August 18, 2006.)

A. ~~When paint is applied to any surface of a residential structure, it shall be lead free.~~ Any paint(s), veneers or varnishes or similar pigmented sealers or finishes applied to any surface of a residential structure must be lead free, in compliance with the Federal Consumer Product Safety Commission's 1978, ban on the use of paint containing lead, in residential properties.

The Director will adopt administrative rules detailing requirements and enforcement of 29.30.60 and 29.30.110 and this provision 29.30.260 A.

B. Residential property ~~shall~~ **must** be free of dangerous levels of hazardous materials, contamination by toxic chemicals, or other ~~circumstances~~ hazardous conditions that would render the property unsafe. Where a governmental agency authorized by law to make the determination, has verified that a property is unfit for use and occupancy due to as a result of hazardous materials or conditions on the property, the property ~~shall~~ **must** also be deemed to be in violation of this Title. Any such property ~~shall~~ **must** remain in violation of this Title until such time as the authorizing agency has approved the ~~abatement~~ remediation of the hazardous materials or conditions. The Director may order such property vacated pursuant to Section 29.60.070 of this Title.

*(See page 11 for additional information about Lead-based paint)*

**BDS Intent:** Amendments to 29.30.260 of Title 29 are designed to:

1. Provide health protections to tenants and occupants of all target housing (pre-1978) with regard to "potential" lead-based paint hazards; and
2. Provide a base-line minimum requirement for Landlords, Apt Owners or others hired to provide service and do work in pre-1978, residential, dwelling units whereby painted surfaces will be disturbed, in keeping with the intent and purpose of Title 29 related to environmental hazards, especially lead-based paint; and
3. Ensure that this Title 29 Amendment provides for the authority to adopt Administrative Rules\*\*; and
4. Ensure this amendment can be easily enforced by BDS Property Compliance Inspectors in order to restore properties to a safe, healthy and habitable condition.

**\*\* Once the Title 29 amendments are approved by Council, Administrative Rules will be drafted for 29.30.260, that will**

- **further define and provide additional requirements such as the EPA Renovation, Repair and Painting Rule (RRP),**
- **to ensure everyone, working on pre-1978 residential dwellings be trained and certified as a Renovator.**

**The EPA RRP requirement as well as the State of Oregon's adopted requirements under RRP are designed to ensure safe work practices are followed, thus reducing possible exposure to lead-based paint hazards.**

**3. QRHW: Provide standards and education for effective remediation and prevention of pest infestation and sanitation violations.**

Proposed Title 29 Amendment(s):

**29.10.020 Definitions.**

**Y. Extermination.** The control and elimination of insects, rodents, vermin or other pests ~~at or about the affected building,~~ by eliminating their harborage places; by removing or making inaccessible those materials that serve as a source of food or water; or by other approved pest elimination methods.

**29.30.130 Insect and Rodent Harborage.** The Director will adopt administrative rules detailing implementation and enforcement of this provision.

**A.** Every dwelling structure shall be kept free from insect and rodent, vermin or other pest infestation, and where ~~insects and rodents are found,~~ they infestations shall be promptly exterminated as set forth in the administrative rules. After extermination, proper precautions ~~shall~~ must be taken to prevent re-infestation.

**29.30.140 Cleanliness and Sanitation.**

**A.** All exterior property areas ~~shall~~ must be maintained in a clean and sanitary condition free from any accumulation of rubbish or garbage. All household garbage ~~shall~~ must be stored in receptacles which are free from holes and covered with tight fitting lids. Receptacles must be of sufficient capacity to prevent the overflow of garbage and rubbish from occurring.

**B.** The interior of every dwelling ~~shall~~ must be maintained in a clean and sanitary condition and free from any accumulation of rubbish or garbage so as not to breed insects and rodents, nor produce dangerous or offensive gases, odors and bacteria, or any other unsanitary condition(s), or create a fire hazard.

**29.30.140.1 Cleanliness and Sanitation. Continued.....**

**C.** The owner of a residential rental property of four or fewer dwelling units ~~shall~~ must provide for each dwelling unit, or subscribe to and pay for weekly recycling and composting service and every-other-week garbage removal service by a franchisee as defined in Chapter 17.102 of the Code of the City of Portland, where a franchisee provides each dwelling unit is provided with at least one 20 gallon receptacle into which garbage and rubbish may be emptied for storage and collection. ~~Receptacles must be of sufficient capacity to prevent the overflow of garbage and rubbish from occurring.~~ Receptacles and lids shall be watertight and provided with handles. All receptacles shall be maintained free from holes and covered with tight-fitting lids at all times.

**D.** The owner of ~~the a~~ residential rental property of five or greater dwelling units ~~shall~~ must subscribe to and pay for weekly recycling and composting service and every-other-week garbage removal service by a refuse collection permittee or franchisee as defined in Chapter 17.102 of the Code of the City of Portland.

**E.** The owner of any owner-occupied residential property ~~shall~~ must ~~be required to~~ subscribe to and pay for weekly recycling and composting service and every-other-week garbage removal service by a refuse collection permittee or franchisee as defined in Chapter 17.02 of the code of the City of Portland if the property has been posted two or more times within one year for violation of Subsection 29.20.010 H.1 or 2.

***Pest infestation and sanitation violations - continued***

**BDS Intent** - amendments to 29.10.020(Y), 29.30.130 and 29.30.140 of Title 29 are designed to:

1. Provide health protections with regard to Insect and Rodent Harborage; and
2. Provide base-line, minimum requirement for Landlords, Apt Owners or others hired to provide pest management services, in keeping with the intent and original purpose of Title 29; and
3. Ensure adequate service and proper waste containers are provided for all residential properties to reduce the accumulation of garbage and refuse as a harborage for vermin and pests; and
4. Ensure that these Title 29 Amendments provides for the authority to adopt Administrative Rules\*\*; and
5. Ensure this amendment can be easily enforced by BDS Property Compliance Inspectors in order to restore properties to a safe, healthy and habitable condition.

**\*\* Once the Title 29 amendments are approved by Council, Administrative Rules will be drafted for 29.10.020(Y), 29.30.130 and 29.30.140, that will**

- **further define extermination; and**
- **ensure the application and use of Integrated Pest Management (IPM) processes are implemented; and**
- **reduce the use of and possible occupant exposure to toxic chemicals.**

**5. QRHW: Amend the Maintenance Code to define and eliminate excessive moisture that creates conditions conducive to mold growth.**

Proposed Title 29 Amendment(s):

**29.30.120 Interior Dampness.**

The Director will adopt administrative rules detailing implementation and enforcement of this provision.

A. To prevent conditions conducive to decay, mold growth, or deterioration of a structure. Every dwelling, including basements, attics, and crawl spaces shall be maintained reasonably free from dampness such that: to prevent conditions conducive to decay, mold growth, or deterioration of the structure.

1. There are no sources of moisture intrusion from either exterior or interior sources; and
2. There is no visible or otherwise demonstrable growth of mold or mildew in the in the interior of any building; and
3. The relative humidity of the interior space does not exceed 60%.

B. When visible or otherwise demonstrable growth of mold or mildew is found to exist within a residential unit, the property owner must remediate and treat the affected and identified areas in accordance with the requirements set forth in the administrative rules.

C. When both a visible or otherwise demonstrable growth of mold or mildew is present, and the relative humidity of the interior space exceeds 60% is found to exist within a residential unit, an approved ventilation system for reducing moisture may be required for each bathroom with bathing facilities that does not have an approved mechanical ventilation system. The new mechanical ventilation system must be installed and be sized to provide ventilation per the requirements of the Oregon Residential Specialty Code for one and two-family dwellings or the Oregon Mechanical Specialty Code for commercial structures.

D. When there is an existing, approved mechanical ventilation system in a bathroom, it must be capable of exhausting a minimum of 50 CFM air flow and vented through the building envelope to the exterior. If an

**29.30.120 Interior Dampness. – continued**

D. existing ventilation system fails to meet these criteria and cannot be repaired nor retrofitted, it must be replaced according to the specifications for new ventilation systems listed in 29.30.120 subsection C.

**BDS Intent** - amendments to 29.30.120 of Title 29 are designed to:

1. Provide enabling language for reducing interior dampness and thereby reducing the likelihood of mold or mildew growth; and
2. Provide health protections to tenants and occupants regarding "potential" mold hazards; and
3. Ensure that this Title 29 Amendment provides for the authority to adopt Administrative Rules\*\*; and
4. Ensure this amendment can be easily enforced by BDS Property Compliance Inspectors in order to restore properties to a safe, healthy and habitable condition

**\*\*Once the Title 29 amendments are approved by Council, Administrative Rules will be drafted for 29.30.120, that will**

- **further define inspection requirements based on industry accepted, recognized best-practices; and**
- **educate landlords and tenants that mold is a symptom of an underlying moisture issue which must also be corrected; and**
- **provide standards and requirements for the treatment and remediation of mold following EPA guidelines and recommended industry, best practices; and**
- **require contractor certification when the visible existence of mold exceeds established area standards deemed "minor".**

*(See pages 12–13 for additional information about mold)*

**5.QRHW: Enforcement Recommendations: Improve Enforcement Tools: Adopt the Enhanced Complaint Model for inspections.**

*Proposed Title 29 Amendment(s)*

**29.50.20.1 Inspections Required.**

(Amended by Ordinance No. 180330, effective August 18, 2006.) All buildings, structures, dwelling units, or other improvements within the scope of this Title, or within the requirements of code enforcement programs created under the authority of this Title or Title 3, as set forth by the Director in the Administrative Rules, and all construction work for which a permit is required ~~shall~~ must be subject to inspection as required by the City Code.

**BDS Intent** - amendments to 29.50.20 of Title 29 are designed to:

1. Provide enabling language to support required inspections for the Enhanced Rental Inspections Program (ERIP), ensuring all properties are maintained in a safe, healthy and habitable condition.; and
2. Ensure that this Title 29 Amendment provides for the authority to adopt Administrative Rules\*\*; and
3. Ensure this amendment can be easily enforced by BDS Property Compliance Inspectors in order to restore properties to a safe, healthy and habitable condition.
4. To ensure the creation of additional enforcement programs are in keeping with the intent and original purpose of Title 29

**\*\*Once the Title 29 amendments are approved by Council, Administrative Rules will be drafted for 29.50.20.1, that will**

- **further define and revise ERIP processes for effective and consistent enforcement.**

## Additional Abbreviated Lead-Based Paint Information

### **The EPA Renovation, Repair & Painting (RRP) Rule, established national requirements:**

1. **Effective in 2010:** Training Requirements for Painters, Contractors, Handymen & Landlords disturbing painted surfaces on any pre-1978 dwelling units, child-care facilities and schools:
  - Must complete an approved EPA RRP course to be trained in lead-safe work practices;
  - Be registered with the EPA or State as a both a Certified Renovator (the person) and as a Certified RRP Firm (the business even if sole proprietor);
  - Complete ongoing required RRP refresher training and recertification
2. **Effective in 2010:** Disclosure Requirements prior to performing repairs, maintenance or painting on all pre-1978 dwellings:
  - Prior to beginning any repair, maintenance or painting work in an occupied dwelling, occupants (owner or tenant) must be provided a copy of the EPA "Renovate Right" pamphlet

### **Oregon Health Authority (OHA), Public Health Division > Environmental Public Health > Healthy Homes & Neighborhoods > Toxic Substances**

- Is the State Agency responsible for providing resources and guidelines for Lead-based paint hazards
- Oversees training and Certification for Abatement Contractors and Inspectors
- Responsible for County Health Departments, activities, screening protocols and investigations for EBLL and poisoning
- Provides training and certification for and enforces EPA's RRP Rule in Oregon

### **The HUD Lead Safe Housing Rule: Title 24 of the Code of Federal Regulations part 35, established national requirements:**

1. **Effective in 1996:** Disclosure Requirements related to all pre-1978 residential sales and lease(s):
  - All sellers, landlords or their agents, must provide a copy of the EPA "Protect Your Family from Lead" pamphlet to buyer(s) and tenant(s)
  - Must disclose any "known" lead-based paint (if property was tested)
2. **Effective in 1999:** Required Testing for lead-based paint in pre-1978 dwellings, only applies to:
  - Federally owned or funded properties, or in conjunction with any federally funded repair, renovation, weatherization or lead hazard programs. (for example, CDBG or HOME funded programs through PHB); or
  - As adopted by each State or under the authority of the EPA to investigate elevated blood-lead level (EBLL) and lead-poisoned children. This work is directed by the State and County Health Departments. (not Minimum Housing code officials)
3. **Effective in 1999:** Abatement Requirements established:
  - Only contractors trained and certified as Lead Supervisors with Lead-safe Trained Workers may perform Lead-based paint abatement activities
  - Abatement is often required in response to EBLL and Lead poisoning investigation (directed by local Health authorities)
  - Abatement is required on Federally funded repair, renovation, weatherization or full rehabilitation projects with greater than \$25,000 of federal hard costs, such as CDBG or HOME funds, where Lead-based paint has been identified or presumed.

## Additional Mold / Mildew Information & Frequently Asked Questions



From OHA website

### **Oregon Health Authority (OHA), Public Health Division**

**>Environmental Public Health>Healthy Homes & Neighborhoods>Toxic Substances**

#### **What is mold?**

*Molds are fungi that grow in different shapes, sizes and colors. In nature molds break down dead and decaying material. In indoor environments, molds can cause structural damage because they consume and destroy the material they settle upon.*

#### **What causes mold to grow?**

*Molds need moisture to grow. Some household situations that lead to mold growth include: clogged gutters and downspouts; leaky plumbing; leaky roofs; using hot water without venting the steam to outdoor air. Also, when indoor air is warmer than outdoor air, moisture can collect on cold surfaces like single pane windows, uninsulated walls, pipes and roofs.*

#### **Should I test for mold or have mold samples from my home tested?**

*Generally, it is not helpful to test for mold in your home. There are no standards to judge "safe" levels of indoor mold. Therefore, testing cannot tell you if the amount of mold detected will harm your health. Typically, if you can see mold or smell musty odors, you have a mold problem.*

#### **Can the government inspect my home for mold?**

*County and state public health departments do not have resources for inspecting private homes or testing for mold.*

#### **What should I do if I have moldy conditions in my home?**

- *The key to mold control is moisture control. If mold is a problem in your home, clean up the mold and fix the water problem.*
- *Keep indoor humidity at 30 to 60 percent.*
- *Use air conditioners and/or dehumidifiers to reduce moisture in the air.*
- *Use exhaust fans to pull indoor moisture (from cooking, showering and laundering, etc) outside.*
- *Increase air circulation by moving furniture several inches away from the walls.*
- *Remove carpeting in areas where there is ongoing moisture (from cooking, sinks, bathtubs and showers).*

### **What is the difference between Mold and Mildew?**

*Mildew refers to certain kinds of mold or fungus. The term mildew is often used generically to refer to mold growth, usually with a flat growth habit. Molds include all species of microscopic fungi that grow in the form of multi-cellular filaments, called hyphae. Molds can thrive on any organic matter, including clothing, leather, paper, and the ceilings, walls and floors of homes with moisture management problems.*

### **Are there Federal regulations or standards regarding mold?**

*Standards or Threshold Limit Values (TLVs) for airborne concentrations of mold, or mold spores, have not been set. Currently, there are no EPA regulations or standards for airborne mold contaminants.*

### **Is sampling/testing for mold necessary?**

*In most cases, if visible mold growth is present, sampling is unnecessary. Since no EPA or other federal limits have been set for mold or mold spores, sampling cannot be used to check a building's compliance with federal mold standards.*

### **What are the three points to control moisture in your home?**

*Water in your home can come from many sources. Water can enter your home by leaking or by seeping through basement floors. Showers or even cooking can add moisture to the air in your home. The amount of moisture that the air in your home can hold depends on the temperature of the air. As the temperature goes down, the air is able to hold less moisture.*

- 1. The key to mold control is moisture control.*
- 2. If mold is a problem in your home, you should clean up the mold promptly and fix the water problem.*
- 3. It is important to dry water-damaged areas and items within 24-48 hours to prevent mold growth.*

### **Who can test my home or clean, fix and remediate my home for mold?**

*EPA does not have a certification program for mold inspectors or mold remediation firms. EPA does not maintain a list of mold inspectors or mold remediation firms, though some states might. Some states and organizations may require certification, trainings, or examinations for practitioners in the indoor air quality industry.*