



HEALTHIER WORKPLACES | A HEALTHIER WORLD

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February 9, 2026

Dear Chairman Wicker, Ranking Member Reed, Bill Sponsor Senator Blumental, and other members of the United States Senate Committee on Armed Services:

On behalf of the American Industrial Hygiene Association (AIHA), thank you for introducing and taking up in Committee the *Military Occupancy Living Defense (MOLD) Act* to strengthen health and safety protections for military families residing in privatized housing. We share your commitment to ensuring that housing conditions do not compromise health or mission readiness - particularly where water intrusion, humidity, and mold are persistent hazards.

As you develop and refine the bill's provisions related to mold and indoor environmental quality, AIHA recommends that the legislation explicitly recognize the **Certified Industrial Hygienist (CIH)** as an appropriate, and in many cases preferred, credentialed professional to lead or oversee mold exposure assessments, building-related exposure investigations, and post-remediation clearance determinations.

CIHs are trained in exposure science; sampling strategy and limitations; moisture and contaminant source evaluation; interpretation of environmental data in the context of health risk; and the design and verification of effective controls. This expertise directly aligns with the bill's focus on enforceable standards, independent inspections, and transparent reporting related to water damage, humidity, and mold.

Accordingly, AIHA respectfully suggests consideration of legislative or accompanying report language that would:

- **Define a “qualified independent assessor”** for mold and indoor environmental quality as a CIH (or an equivalently qualified professional operating under CIH oversight), with clear requirements for independence and avoidance of conflicts of interest.
- **Clarify the scope of mold-related evaluations** to include moisture sources, exposure pathways, and post-remediation verification, rather than relying solely on visible mold or contractor-reported completion.
- **Ensure consistency in inspection and clearance expectations** across installations and regions - including high-humidity climates - supported by clear documentation standards.

AIHA stands ready to support your offices with technical expertise. We would welcome the opportunity to convene a small working group of subject-matter experts from our technical committees to provide practical, implementable input on definitions, qualifications, and evaluation and verification elements, helping ensure the bill's inspection and accountability framework reliably protects military families and supports mission readiness.

Thank you again for your leadership. We would welcome the opportunity to brief your staff and provide technical assistance as the legislation moves forward.

Sincerely,

A handwritten signature in blue ink, appearing to read "Lawrence D. Sloan". The signature is fluid and cursive, with a long horizontal stroke at the end.

Lawrence D. Sloan, MBA, CAE, FASAE
CEO, American Industrial Hygiene Association