



May 4, 2018

Senator Daniel Martin, Chairman (martinyd@legis.la.gov)

Senator Mack White, Vice Chairman (whitem@legis.la.gov)

State of Louisiana

Senate Committee on Commerce, Consumer Protection and International Affairs

P.O. Box 94183

Baton Rouge, La 70804

Re: House Bill No. 748, "Occupational Licensing Review Act"

Dear Senators,

The Building Commissioning Certification Board (BCCB) and the nonprofit membership organization, Building Commissioning Association (BCxA), appreciate the opportunity to provide public comment on the Louisiana legislature's House Bill No. 748 with respect to using "*the least restrictive regulation to protect consumers from present, significant, and empirically substantiated harms threatening public health and safety.*"

As an American National Standards Institute (ANSI) accredited organization to the standard ANSI/ISO/IEC 17024:2013 the BCCB has worked diligently to prepare Certified Commissioning Professionals (CCPs), meeting eligibility requirements for both experience and rigorous testing, to work with project teams, including architects, design engineers, and building code enforcement officers (BCEOs), to ensure that commercial buildings are designed and constructed with integrated systems that are tested, verified and documented for safety, security, physical and cyber-resilience, reliability, efficiency and, not least of all, comfort.

These are all especially critical issues for buildings in Louisiana where high-impact natural hazardous conditions occur. There is no other profession that crosses the technical spectrum of building risk management between design teams, construction teams and operations personnel. There is also no other profession that has the wide range of skills necessary to work with BCEOs to verify and document comprehensive building performance before (and even after) occupancy.

Furthermore, as a result of inconsistently delivered commercial building quality, the BCxA worked diligently with the U.S. Department of Energy and National Institute of Building Science's Commercial Workforce Credentialing Council to evaluate and create voluntary national guidelines, known as the "Better Buildings Workforce Guidelines" (BBWG) to improve the quality and uniformity of commercial building workforce credentials – hence, a level of knowledge, skills and abilities to help avoid "harms threatening public health and safety." The resulting Job Task Analysis, conducted by subject matter experts across the nation, laid out a means by which individuals can select and achieve expertise in this field.

Commissioning professionals are most often hired as a third party owner's advocate based on qualifications to ensure that the owner's project requirements are met. They, along with design and construction professionals, must adhere to the 2014 National Electric Code, 2015 International Building Code, the International Existing Building Code, Mechanical Code, Plumbing Code and Fuel Gas Code adopted by the State of Louisiana on December 12, 2017. Commissioning providers understand and work with professionals in each of these areas, as well as with controls manufacturers and trades, to ensure that systems are properly designed, installed, integrated and functioning as a whole before occupancy.

We believe it is not unwise to review and limit unnecessary certifications, but to restrict the use and naming of qualifications in a way that may potentially harm public safety and security does create ambiguous expectations and inconsistent outcomes. ISO-certified, ANSI-accredited commissioning certification is not a professional requirement, but also should not be denied as a method of "separating the wheat from the chaff." An inadequately functioning building is a dangerous building.

At the very least, we urge you to consider allowing commissioning professionals to continue using their hard-earned certification for new construction and existing building commissioning as a means of ensuring that the building in which you sit right now will function safely on your behalf over time.

Sincerely,



Christopher W. Piché, P.Eng, LEED AP, CPMP
President
Building Commissioning Certification Board



John D. Villani, PE, CCP, CEM, LEED AP
President
Building Commissioning Association

Cc: Senator John Alario, Jr. (alarioj@legis.la.gov)
President, Louisiana Senate