

September 4, 2026

U.S. House of Representatives
Washington, DC 20515

Re: Support H.R. 7188, the Military Occupancy Living Defense (MOLD) Act

Dear Representative:

The Sheet Metal and Air Conditioning Contractors' National Association (SMACNA) is supported by more than 3,500 construction firms engaged in industrial, commercial, residential, architectural and specialty sheet metal and air conditioning construction in both the public and private sectors throughout the United States. On behalf of our membership, **I write to express our strongest support for H.R. 7188, the Military Occupancy Living Defense (MOLD) Act, introduced by Rep. Jimmy Panetta (D-CA) and cosponsored by Reps. Gus Bilirakis (R-FL) and James Moylan (R-GU).** SMACNA also endorses its Senate companion, S. 3654, led by Senators Richard Blumenthal (D-CT) and Tim Sheehy (R-MT) with Senators Joni Ernst (R-IA) and Mazie Hirono (D-HI) as original cosponsors. This bipartisan and bicameral legislation would establish enforceable health and safety standards for the privatized housing occupied by an estimated 700,000 servicemembers and their families nationwide.

Thousands of military families living in privatized housing have been exposed to hazardous conditions, including widespread mold contamination, as a result of negligent maintenance practices and inadequate government oversight. Prolonged exposure of this kind is associated with elevated rates of respiratory illness, neurological symptoms and developmental effects in children, and families have too often absorbed the cost themselves through temporary relocation, lost personal property and medical care. Inconsistent inspections, weak contractor accountability and the use of non-disclosure agreements to quiet tenants reporting unsafe conditions have compounded the problem and obscured its scale. Conditions of this kind reach well beyond quality of life and directly affect the health of military families and the readiness of the force they support.

Specifically, H.R. 7188 would:

- Direct the Department of Defense to implement a uniform code of basic housing standards for safety, comfort and habitability, informed by a nationally recognized consensus-based model property maintenance code, including Department-wide requirements for acceptable levels of relative humidity;
- Require independent inspections by certified third-party professionals at tenant move-in and move-out, following complaints, and after remediation, with results provided to tenants;
- Require that failing units be remediated, or affected families relocated, within a defined period;
- Establish a 24/7 complaint hotline and public hazard reporting website, with a required landlord response within five business days;
- Hold housing contractors financially accountable for inspection, remediation, relocation and property loss, with penalties including withheld fees and permitting tenants to retain their Basic Allowance for Housing; and
- Establish a dedicated Department of Defense oversight office and public reporting requirements.

SMACNA supports this legislation because the conditions it addresses are, at their root, mechanical systems failures. Mold does not appear in a housing unit at random. It follows sustained moisture, uncontrolled humidity, unbalanced or inadequate ventilation, deteriorated ductwork, and HVAC systems that were never properly commissioned, tested or maintained. Our member firms design, install, test, balance and service exactly these systems, and SMACNA develops and publishes the industry technical standards and indoor air quality guidance governing this work. From that experience we can tell you plainly that the enforceable humidity and ventilation criteria, independent inspection and verified remediation this bill requires are the correct and durable response. Cosmetic remediation that leaves the underlying moisture and ventilation deficiency in place guarantees that the next family assigned to that unit will file the same complaint.

For that same reason, the qualifications and certifications of the workers performing HVAC installation, maintenance and remediation will largely determine whether a corrective action plan produces a healthy home or simply a closed work order. Skilled and certified mechanical technicians, the overwhelming majority of whom in our sector come out of privately funded registered apprenticeship programs, are the difference between remediation that holds and remediation that fails, and we would encourage the Department of Defense to insist on demonstrated competency in the trades performing this work as it carries out the bill.

This effort is fully consistent with the broader indoor air quality agenda SMACNA has advanced as a top priority to Congress for many years, including H.R. 9886, the Federal Facilities Indoor Air Quality Assessment Act. We also note with approval that the Senate Armed Services Committee included a major military housing health and safety provision based on the MOLD Act in its version of the National Defense Authorization Act for Fiscal Year 2027, and we strongly urge that the provision be retained and strengthened to reflect the full scope of H.R. 7188 as the two chambers reconcile their bills.

SMACNA urges your co-sponsorship and vocal support for H.R. 7188, and your support for retention of the MOLD Act provisions in the final FY 2027 National Defense Authorization Act. Thank you for your consideration of this long overdue effort to protect the health, safety and readiness of the military families who have every right to expect a safe place to live. SMACNA stands ready to serve as an industry resource on the ventilation, humidity control, HVAC and remediation workforce questions raised by this proposal.

Sincerely,

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