



COMMONWEALTH of VIRGINIA

Office of the Attorney General
Richmond 23219

Jerry W. Kilgore
Attorney General

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November 8, 2004

Evelyn B. Brown
Executive Director
Virginia Board of Counseling
6603 West Broad Street
Richmond, VA 23230-1712

RE: Proposed Regulations
18 VAC 115-15-10 et seq. Regulations Governing Delegation to an Agency Subordinate

Dear Ms. Brown:

I have reviewed the proposed regulation, 18 VAC 115-15-10 et seq., in accordance with the Administrative Process Act, as adopted by the Board of Counseling at its meeting on November 5, 2004. The amended regulations relating to delegation of informal fact-finding to an agency subordinate are constitutional and in conformity with statutory provisions of Chapter 64 of the 2004 Acts of the Assembly.

Sincerely,

A handwritten signature in black ink, appearing to read "H. Casway".

Howard M. Casway
Assistant Attorney General

cc: Elaine J. Yeatts, Agency Regulatory Coordinator
Department of Health Professions