



# COMMONWEALTH of VIRGINIA

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## MEMORANDUM

**TO:** Raymond. E. Hopkins  
Commissioner  
Virginia Department for the Blind and Vision Impaired

**FROM:** Pamela B. Beckner  
Assistant Attorney General

**DATE:** November 21, 2018

**SUBJECT:** Proposed Fast Track Amendments to *Regulations to Govern the Operation of Vending Facilities in Public Buildings and Other Property*, 22 VAC 45-20

I have reviewed the above-referenced proposed fast track amendments to the Regulations to Govern the Operation of Vending Facilities in Public Buildings and Other Property, 22 VAC 45-20, which were approved by you on November 20, 2018. As the Commissioner of the Department for the Blind and Vision Impaired, you have the statutory authority to promulgate the amendments to these regulations under Virginia Code § 51.5-65. The proposed amendments update the Department's name, correct the citation for the definition of "blind person," and align state regulations with language in the federal regulations as to the frequency of set aside charges and the disbursement of vending machine income to blind vendors. The proposed amendments are constitutional and do not conflict with existing federal or state laws or regulations.

If I may be of further assistance to you regarding this matter, please do not hesitate to contact me.