



**COMMONWEALTH of VIRGINIA**  
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November 5, 2008

James Farrell, Director  
Division of Immunization  
Virginia Department of Health  
109 Governor Street  
Richmond, Virginia 23219

Re: Regulations for the Immunization of School Children  
12 VAC 5-110 *et seq.*

Dear Mr. Farrell:

I have reviewed the updated regulations for the immunization of school children. These regulations do not conflict with other federal or state statutes or regulations and do not violate the United States or Virginia Constitutions.

The Board of Health has the authority to promulgate the regulations under Va. Code §§ 32.1-12 and 32.1-46. The regulations are consistent with the Board's mandate, and the Board will not exceed its statutory authority by approving these regulations.

Very truly yours,

Robin V. Kurz  
Special Counsel