



COMMONWEALTH of VIRGINIA

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MEMORANDUM

To: C. Ray Davenport
Commissioner
Virginia Department of Labor and Industry

From: Joshua E. Laws
Assistant Attorney General

Date: March 11, 2021

Subject: Letter of Assurance for Regulations Governing On-the-Job Training Programs or Other Training Programs — found at 16 VAC15-60

I have reviewed the Department of Labor and Industry's proposed Regulations Governing On-the-Job Training Programs or Other Training Programs — found at 16 VAC15-60 that was posted on the Virginia Regulatory Town Hall on March 10, 2021. In my view, as counsel to the Department of Labor and Industry, these regulations may be promulgated pursuant to Title 40.1 of the Code of Virginia. Further, I certify that the proposed changes may be promulgated under Code of Virginia § 2.2-4011(A) as the Governor's Office has already approved the use of emergency regulatory authority for this change.

This memorandum addresses legal matters only and is not intended to serve, nor should it be construed, as a comment for or against the merits of the proposed regulations.