



**COMMONWEALTH of VIRGINIA**  
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*Richmond 23219*

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**MEMORANDUM**

**TO:** Dr. Lisa Coons  
Superintendent of Public Instruction  
Virginia Department of Education

**FROM:** Deborah A. Love  
Senior Assistant Attorney General

**DATE:** February 13, 2025

**SUBJECT:** Periodic Review of *Regulations Governing School Activity Funds* [8VAC20-240]  
(Review 2516)

Consistent with the provisions of § 2.2-4017 of the *Code of Virginia*, Executive Order 19 (2022), and the procedures of the Office of Regulatory Management required by Executive Order 19, I have reviewed the above-referenced regulations to ensure general statutory authority to promulgate the regulations, and to identify any specific authority for the regulation undergoing periodic review.

Pursuant to § 22.1-16 of the *Code of Virginia*, the Board of Education has authority to promulgate regulations as may be necessary to carry out its statutory powers and duties and the provisions of Title 22.1 of the *Code of Virginia*.

Thus, in my view the Board has the statutory authority to promulgate the above-referenced regulations.

If you have any questions or concerns, please feel free to contact me at the address above, by telephone at (804) 786-3807, or by electronic email at [dlove@oag.state.va.us](mailto:dlove@oag.state.va.us).