



# **COMMONWEALTH of VIRGINIA**

*Office of the Attorney General*

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## **MEMORANDUM**

**To:** Elizabeth O. Rafferty  
Policy and Legislative Director  
Department of Housing and Community Development  
  
Bill Shelton  
Director  
Department of Housing and Community Development

**From:** Justin I. Bell  
Assistant Attorney General

**Date:** February 7, 2017

**Subject:** Letter of Assurance for Update to the Industrialized Building Safety Regulations, 13 VAC 5 – 91.

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I have reviewed the Department of Housing and Community Development's proposed update to the Industrialized Building Safety Regulations. In my view, as counsel to the Department of Housing and Community Development, these regulations may be promulgated pursuant to §§ 36-73 and 2.2-4006(A)(12) of the *Code of Virginia*. The regulations do not appear to conflict with the Constitution of the United States or the Constitution of the Commonwealth of Virginia, nor do they appear to conflict with any federal or state law currently in effect.

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.