



COMMONWEALTH of VIRGINIA

Office of the Attorney General

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MEMORANDUM

To: Kyle Flanders
Senior Policy Analyst
Department of Housing and Community Development

From: Justin I. Bell
Assistant Attorney General

Date: February 5, 2021

Subject: Letter of Assurance for Review and Update of the Virginia Certification Standards, 13 VAC 5-21.

I have reviewed the Board of Housing and Community Development's proposed Review and Update of the Virginia Certification Standards that was posted to the Virginia Regulatory Town Hall on December 30, 2020. In my view, as counsel to the Board of Housing and Community Development, the Board may amend these regulations pursuant to § 36-137 of the *Code of Virginia*. The regulations and amendments do not appear, on their face, to conflict with the Constitution of the United States or the Constitution of the Commonwealth of Virginia, nor do they appear to conflict with 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.