



**COMMONWEALTH of VIRGINIA**  
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**MEMORANDUM**

**TO:** Raymond E. Hopkins  
Commissioner  
Virginia Department for the Blind and Vision Impaired

**FROM:** Pamela B. Beckner  
Assistant Attorney General

**DATE:** December 14, 2018

**SUBJECT:** Periodic Review and Small Business Impact Review  
*Provision of Independent Living Rehabilitation Services*  
(22 VAC 45-80)

In accordance with Virginia Code §§ 2.2-4007.1 and 2.2-4017 and Executive Order 14 (as amended July 16, 2018), I have reviewed the Department for the Blind and Vision Impaired's *Provision of Independent Living Rehabilitation Services*, 22 VAC 45-80. These regulations are undergoing periodic review and a small business impact review. In my opinion, as counsel to the Department, the Commissioner had the authority under Virginia Code § 51.5-65 to adopt the current regulations, and the Commissioner has the authority to amend the regulations.