



COMMONWEALTH of VIRGINIA

Office of the Attorney General
Richmond 23219

Jerry W. Kilgore
Attorney General

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June 8, 2004

Evelyn B. Brown
Executive Director
Virginia Board of Counseling
6603 West Broad Street
Richmond, VA 23230-1712

**RE: 18 VAC 115-15-10 et seq.
Regulations Governing Delegation to an Agency Subordinate**

Dear Ms. Brown:

I have reviewed the Emergency Regulation, 18 V AC 115-15-10 et seq., in accordance with the Administrative Process Act, as adopted by the Board of Counseling at its meeting on June 4, 2004. The amended regulations are constitutional and in conformity with statutory provisions of Chapter 64 of the 2004 Acts of the Assembly.

The "emergency situation" which exists is specified in §2.2-4011 of the Code of Virginia as one in which the agency is required by statutory law to have a regulation in effect within 280 days from the enactment of the law. Having satisfied all legal requirements, you may proceed to take the necessary steps to promulgate this emergency regulation in accordance with the requirements of the Administrative Process Act.

Sincerely,

A handwritten signature in black ink, appearing to read "H. Casway", written over a white background.

Howard M. Casway
Assistant Attorney General

cc: Elaine J. Yeatts, Agency Regulatory Coordinator
Department of Health Professions