



COMMONWEALTH of VIRGINIA

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Sara Redding Wilson, Esquire
Director, Department of Human Resource Management
101 N. 14th Street
James Monroe Building, 12th Floor
Richmond, Virginia 23219

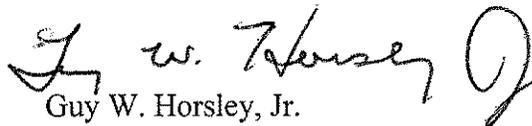
Re: Proposed Revisions to DHRM Regulations for Health Benefits Program

Dear Sara:

I have reviewed the proposed revisions to regulations governing the Health Benefits Program administered by the Department of Human Resource Management ("DHRM") pursuant to Va. Code § 2.2-2818 and § 2.2-1204. The amendments will affect a number of sections in the Administrative Code, 1VAC 55-20 *et seq.*, as described in the Background Document dated September 24, 2013 and posted by DHRM on the Regulatory Town Hall website.

I am of the opinion that the proposals are within the authority of DHRM, and do not conflict with state or federal law. Moreover, because none of the proposed changes substantively alter existing regulations except to the extent required by law, I do not expect the proposed regulations to be controversial. To the contrary, the proposals liberalize eligibility and either clarify other sections of existing regulations or make appropriate technical changes. Accordingly, I believe that the proposals qualify for the fast track rule making process as authorized by Va. Code § 2.2-4012.1.

Sincerely yours,


Guy W. Horsley, Jr.
Special Assistant Attorney General