

December 22, 2003

Mr. Charles S. Reed  
Associate Director, Office of Health Benefits  
Department of Human Resource Management  
101 N.14<sup>th</sup> Street, 13<sup>th</sup> Floor  
Richmond, VA 23219

Re: Final Regulations: Commonwealth of Virginia Health Benefit Plan  
(1VAC55)

Dear Mr. Reed:

I have reviewed the current version of the proposed final regulations governing the Commonwealth of Virginia Health Benefit Plan, 1VAC55, which have been approved for filing with the Registrar of Regulations by the Director of the Department of Human Resource Management. I understand these regulations contain several changes from the original proposed regulations which may be characterized as “substantial” as that term is used in the Administrative Process Act. Having reviewed the regulations, I am of the opinion that they are consistent with state and federal law and are within the legal authority of the Department of Human Resource Management.

Sincerely yours,

Guy W. Horsley, Jr.  
Senior Assistant Attorney General