



COMMONWEALTH of VIRGINIA

Office of the Attorney General

Robert F. McDonnell
Attorney General

900 East Main Street
Richmond, Virginia 23219
804-786-2071
FAX 804-786-1991
Virginia Relay Services
800-828-1120
7-1-1

MEMORANDUM

To: Cameron Stiles, Chair
APELSCIDLA Board
Department of Professional and Occupational Regulation

Kate Nosbisch, Executive Director
APELSCIDLA Board
Department of Professional and Occupational Regulation

From: Steven P. Jack
Assistant Attorney General

Date: October 16, 2008

Subject: Letter of Assurance for Amendments to Board Regulations 18 VAC 10-20

I have reviewed the APELSCIDLA Board's proposed amendments to its regulations, particularly 18 VAC 10-20, that were posted on the Virginia Regulatory Town Hall internet site on October 11, 2007. In my view, as counsel to the APELSCIDLA Board, these regulations may be promulgated pursuant to §§ 54.1-201(5), 54.1-404, and 54.1-411(C) of the *Code of Virginia*. The regulations do not appear to conflict with the Constitution of the United States or the Constitution of the Commonwealth of Virginia, nor do they appear to conflict with any 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.