

COMMONWEALTH of VIRGINIA

Office of the Attorney General Richmond 23219

202 North Ninth Street Richmond, Virginia 23219 804 - 786 - 2071 804 - 225 - 4541 TDD

MEMORANDUM

- To: Evelyn McGill Executive Director Virginia Workers' Compensation Commission
- From: Joshua E. Laws Assistant Attorney General
- **Date:** August 28, 2017

Mark R. Herring

Attorney General

Subject: Letter of Assurance for Proposed Regulations – Final Rule for Regulations Governing Workers' Compensation Electronic Medical Billing found at 16 VAC 30-16

I have reviewed the Virginia Workers' Compensation Commission's ("the Commission") proposed regulations governing Workers' Compensation electronic medical billing found at 16 VAC 30-16 that was posted on the Virginia Regulatory Town Hall on June 28, 2017. In my view, as counsel to the Virginia Workers' Compensation Commission, these regulations may be promulgated pursuant to Title 65.2-605.1(H) 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.