



COMMONWEALTH of VIRGINIA

*Office of the Attorney General
Richmond 23219*

Jason S. Miyares
Attorney General

202 N. 9th Street
Richmond, Virginia 23219
804 - 786 - 2071
804 - 225 - 4541 TDD

MEMORANDUM

To: Gary G. Pan
Commissioner
Virginia Department of Labor and Industry

From: Joshua E. Laws
Senior Assistant Attorney General

Date: December 7, 2023

Subject: Letter of Assurance for Regulations Governing On-the-Job Training Programs or Other Training Programs — found at 16 VAC15-60

I have reviewed the Department of Labor and Industry's proposed Regulations Governing On-the-Job Training Programs or Other Training Programs — found at 16 VAC15-60 that was posted on the Virginia Regulatory Town Hall on December 6, 2023. In my view, as counsel to the Department of Labor and Industry, these regulations may be promulgated pursuant to Title 40.1 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.