



COMMONWEALTH of VIRGINIA

Office of the Attorney General

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MEMORANDUM

To: Jeannette Galanis
Executive Director
Virginia Board for Asbestos, Lead, and Home Inspectors
Department of Professional and Occupational Regulation

From: Joshua E. Laws
Senior Assistant Attorney General

Date: August 7, 2026

Subject: Letter of Assurance for Proposed Amendments to Asbestos Licensing Regulations, Lead-Based Paint Activities Regulations, and Home Inspector Licensing Regulations found at 18 VAC 15-21, 18 VAC 15-30, and 18 VAC 15-40

I have reviewed the Virginia Board for Asbestos, Lead, and Home Inspectors' Proposed Amendments to Asbestos Licensing Regulations, Lead-Based Paint Activities Regulations, and Home Inspector Licensing Regulations found at 18 VAC 15-21, 18 VAC 15-30, and 18 VAC 15-40 that were posted on the Virginia Regulatory Town Hall on July 31, 2026. In my view, as counsel to the Department of Professional and Occupational Regulation and the Board for Asbestos, Lead, and Home Inspectors, these regulations may be promulgated pursuant to Title 54.1 of the Code of Virginia and Chapter 772 of the 2026 Acts of Assembly. Further, I certify that the proposed changes are exempt from the Administrative Process Act under Code of Virginia § 2.2-4006(A)(4)(a) as they are necessary to conform to changes in Virginia statutory law or the appropriation act where no agency discretion is involved. 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 appeal 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.