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MEMORANDUM

TO: William L. Harp, M.D.
Executive Director
Virginia Board of Medicine

FROM: Erin L. Barrett
Assistant Attorney General

DATE: November 2, 2016

SUBJECT: *Regulations Governing the Licensure of Occupational Therapists*
18VAC85-80-10 *et seq.*

I have reviewed the proposed amendments to the Regulations Governing the Licensure of Occupational Therapists, 18VAC85-80-10 *et seq.* The proposed amendments change the title of the chapter to be consistent with other regulated professions' chapters, clarify what documents are necessary to apply for renewal, and allow proof of certification maintenance by the National Board of Certification in Occupational Therapy to satisfy continuing education requirements. The Board has the statutory authority to amend this regulation under Virginia Code §§ 54.1-2400(6) and 54.1-2912.1. The proposed amendments are constitutional and do not conflict with existing federal or state laws or regulations.