



COMMONWEALTH of VIRGINIA

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April 15, 2004

Elizabeth Scott Russell
Executive Director
Virginia Board of Pharmacy
6603 West Broad Street
Richmond, VA 23230-1712

**RE: 18 V AC 110-20-10 et seq.
Regulations Governing the Practice of Pharmacy**

Dear Ms. Russell:

I have reviewed the amendment to section 720 to regulations governing the practice of pharmacy adopted by the Board of Pharmacy at its meeting on April 13, 2004. I find the amended regulations are "necessary to conform to changes in Virginia statutory law or the appropriation act where no agency discretion is involved". Therefore, § 2.2-4006 (A)(4)(a) is applicable and the amendment is exempt from Article 2 of the Administrative Process Act.

Sincerely,

A handwritten signature in black ink, appearing to read "H. Casway".

Howard M. Casway
Assistant Attorney General

cc: Elaine J. Yeatts, Agency Regulatory Coordinator
Department of Health Professions