



# COMMONWEALTH of VIRGINIA

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## MEMORANDUM

**TO:** Dr. David Brown  
Director  
Virginia Department of Health Professions

**FROM:** James E. Rutkowski  
Assistant Attorney General

**DATE:** October 18, 2019

**SUBJECT:** *Regulations Governing the Practice of Pharmacy*  
18VAC110-20

I have reviewed the proposed amendments to the *Regulations Governing the Practice of Pharmacy*, 18VAC110-20, that were adopted by the Board of Pharmacy on September 25, 2019. This action is exempt from the operation of the Administrative Process Act and review by the Executive Branch under Virginia Code § 2.2-4006(A)(13) because the Board of Pharmacy is scheduling substances pursuant to Virginia Code § 54.1-3443(D). The Board has the authority to adopt these regulations under Virginia Code § 54.1-3443(D). The proposed amendments are constitutional and do not conflict with existing federal or state laws or regulations.