



**COMMONWEALTH of VIRGINIA**  
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**MEMORANDUM**

**TO:** Arne Owens  
Director  
Virginia Department of Health Professions

**FROM:** M. Brent Saunders  
Senior Assistant Attorney General

**DATE:** October 25, 2023

**SUBJECT:** Periodic Review of the *Public Participation Guidelines*  
18VAC95-11

In accordance with Virginia Code §§ 2.2-4007.1 and 2.2-4017, I have reviewed the *Public Participation Guidelines*, 18VAC95-11. These public participation guidelines are undergoing a required four-year periodic review. In my opinion, the Board of Long-Term Care Administrators had the authority under Virginia Code §§ 2.2-4007.02 and 54.1-2400 to adopt the current regulations, and has the authority to conduct the periodic review and amend the regulations.