



COMMONWEALTH of VIRGINIA
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MEMORANDUM

TO: Arne W. Owens
Director
Virginia Department of Health Professions

FROM: James E. Rutkowski
Assistant Attorney General

DATE: August 25, 2023

SUBJECT: *Delegation of Informal Fact-Finding to an Agency Subordinate*
18VAC115-15

I have reviewed the amendments to the *Delegation of Informal Fact-Finding to an Agency Subordinate*, 18VAC115-15, as adopted by the Board of Counseling on May 5, 2023. The Board has the statutory authority to adopt the amendments under Va. Code § 54.1-2400. The regulations are exempt pursuant to Va. Code § 2.2-2006(A)(4)(a). The proposed amendments are constitutional and do not conflict with existing federal or state laws or regulations.