



**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:** March 28, 2022

**SUBJECT:** *Regulations Governing the Practice of Pharmacy; Regulations Governing the Licensure of Pharmacists and Registration of Pharmacy Technicians*  
18VAC110-20; 18VAC110-21

I have reviewed the proposed amendments to the *Regulations Governing the Practice of Pharmacy*, 18VAC110-20, and the *Regulations Governing the Licensure of Pharmacists and Registration of Pharmacy Technicians*, 18VAC110-21, which were adopted by the Board of Pharmacy on March 15, 2022. The Board has the authority to adopt these regulations under Virginia Code §§ 54.1-2400 and 54.1-3303.1. The proposed amendments are constitutional and do not conflict with existing federal or state laws or regulations.