



COMMONWEALTH of VIRGINIA
Office of the Attorney General

Jason S. Miyares
Attorney General

202 North 9th Street
Richmond, Virginia 23219
804-786-2071
FAX 804-786-1991
Virginia Relay Services
800-828-1120

MEMORANDUM

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

FROM: James E. Rutkowski
Assistant Attorney General

DATE: September 27, 2022

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 6, 2022. 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)(4)(a) because the Board of Pharmacy is removing chemicals from the regulations that were placed in Virginia Code §§ 54.1-3446, 54.1-3448, 54.1-3452, and 54.1-3454 pursuant to 2022 Va. Acts. Chs. 114 and 115. The proposed amendments are constitutional and do not conflict with existing federal or state laws or regulations.