



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

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

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

**DATE:** July 12, 2023

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

I have reviewed the proposed amendments to the *Regulations Governing the Licensure of Pharmacists and Registration of Pharmacy Technicians*, 18VAC110-21, which were adopted by the Board of Pharmacy on March 30, 2023. The Board has the authority to adopt the regulations under 2023 Va. Acts Chs. 171 and 172 and Va. Code §§ 54.1-2400 and 54.1-3303.1. The regulations are emergency regulations pursuant to Va. Code § 2.2-4011. The proposed amendments are constitutional and do not conflict with existing federal or state laws or regulations.