



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

**TO:** William L. Harp, M.D.  
Executive Director

**FROM:** Erin L. Barrett  
Assistant Attorney General

**DATE:** December 17, 2012

**SUBJECT:** *Regulations Governing the Practice of Behavior Analysis*  
18VAC85-150

I have reviewed the proposed Regulations Governing the Practice of Behavior Analysis, 18VAC85-150, as adopted by the Board of Medicine on December 7, 2012. The Board has the statutory authority to promulgate these Regulations under Virginia Code §§ 54.1-2400 and 54.1-2957.16. The proposed Regulations are constitutional and do not conflict with existing federal or state laws or regulations.