



COMMONWEALTH of VIRGINIA

Office of the Attorney General

Mark R. Herring
Attorney General

900 East Main Street
Richmond, Virginia 23219
804-786-2071
FAX 804-786-1991
Virginia Relay Services
800-828-1120
7-1-1

MEMORANDUM

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

FROM: Charis A. Mitchell
Assistant Attorney General

DATE: July 30, 2015

SUBJECT: *Regulations Governing the Practice of Optometry*
18 VAC 105-20-20

I have reviewed the proposed amendments to the *Regulations Governing the Practice of Optometry*, 18 VAC 105-20-20, that were adopted by the Virginia Board of Optometry on July 17, 2015. This action is exempt from the operation of the Administrative Process Act and review by the Executive Branch under § 2.2-4006(A)(6), as it is limited to reducing fees charged to regulants. The Board has the authority to adopt these regulations under Virginia Code § 54.1-2400. The proposed amendments are constitutional and do not conflict with existing federal or state laws or regulations.