



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: December 31, 2019

SUBJECT: *Regulations Governing the Registration of Qualified Mental Health Professionals*
18VAC115-80

I have reviewed the amendments to the *Regulations Governing the Registration of Qualified Mental Health Professionals*, 18VAC115-80, as adopted by the Board of Counseling on November 22, 2019. 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)(6) because the Board of Counseling is reducing fees. The Board has the statutory authority to adopt these Regulations under Virginia Code §§ 2.2-4006 and 54.1-2400. The proposed amendments are constitutional and do not conflict with existing federal or state laws or regulations.