



# 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:** March 2, 2020

**SUBJECT:** *Regulations Governing the Practice of Professional Counseling;*  
*Regulations Governing the Practice of Marriage and Family Therapy;* and  
*Regulations Governing the Practice of Licensed Substance Abuse*  
*Treatment Practitioners*  
18VAC115-20; 18VAC115-50; 18VAC115-60

I have reviewed the amendments to the *Regulations Governing the Practice of Professional Counseling*, 18VAC115-20; the *Regulations Governing the Practice of Marriage and Family Therapy*, 18VAC115-50; and the *Regulations Governing the Practice of Licensed Substance Abuse Treatment Practitioners*, 18VAC115-60, as adopted by the Board of Counseling on November 22, 2019. The Board has the statutory authority to adopt these regulations under Virginia Code §§ 54.1-2400, 54.1-3503, and 54.1-3506. The proposed amendments are constitutional and do not conflict with existing federal or state laws or regulations.