



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

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

**FROM:** M. Brent Saunders  
Senior Assistant Attorney General

**DATE:** June 16, 2023

**SUBJECT:** *Regulations Governing Delegation to an Agency Subordinate*  
18VAC85-15

I have reviewed the proposed amendments to the *Regulations Governing Delegation to an Agency Subordinate*, 18VAC85-15, as adopted by the Board of Medicine on October 6, 2022. The Board has the authority to adopt these regulations under Virginia Code § 54.1-2400. The proposed amendment is constitutional and does not conflict with existing federal or state laws or regulations.