



# 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:** July 2, 2020

**SUBJECT:** *Regulations Governing the Licensure of Pharmacists and Registration of Pharmacy Technicians*  
18VAC110-21

I have reviewed the proposed amendment to the *Regulations Governing the Licensure of Pharmacists and Registration of Pharmacy Technicians*, 18 VAC 110-21, which was adopted by the Board of Pharmacy on June 16, 2020. The Board has the authority to adopt this regulation under Virginia Code §§ 54.1-2400 and 54.1-3314.1. The proposed amendment is constitutional and does not conflict with existing federal or state laws or regulations.