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MEMORANDUM

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

FROM: James E. Rutkowski
Assistant Attorney General

DATE: October 1, 2018

SUBJECT: Periodic Review of the *Public Participation Guidelines*
18 VAC 115-11

In accordance with Virginia Code § 2.2-4017, I have reviewed the Board of Counseling's *Public Participation Guidelines*, 18 VAC 115-11. These regulations are undergoing periodic review. In my opinion, the Board had the authority under Virginia Code § 54.1-2400 to adopt the current regulations, and the Board has the authority to amend the regulations.