



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

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

**FROM:** James E. Rutkowski  
Assistant Attorney General

**DATE:** March 25, 2022

**SUBJECT:** Periodic Review of the *Regulations Governing the Practice of Professional Counseling*  
18VAC115-20

In accordance with Virginia Code § 2.2-4017, I have reviewed the *Regulations Governing the Practice of Professional Counseling*, 18VAC115-20. These regulations are undergoing periodic review. In my opinion, the Board of Counseling had the authority under Virginia Code § 54.1-2400 and Chapter 35 (§ 54.1-3500 et seq.) of Title 54.1 of the Code of Virginia to adopt the current regulations, and the Board of Counseling has the authority to amend the regulations.