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MEMORANDUM

TO: Lisa Hahn
Executive Director
Virginia Board of Physical Therapy

FROM: Erin L. Barrett
Assistant Attorney General

DATE: June 15, 2016

SUBJECT: *Regulations Governing the Practice of Physical Therapy*
18VAC112-20-121

I have reviewed the proposed Regulations Governing the Practice of Physical Therapy, 18VAC112-20-121. The proposed regulation specifies requirements for licensed physical therapists to utilize the procedure known as dry needling. The Board has the statutory authority to promulgate this regulation under Virginia Code §§ 54.1-2400 and 54.1-3475. The proposed regulation is constitutional and does not conflict with existing federal or state laws or regulations.