



**COMMONWEALTH of VIRGINIA**  
*Office of the Attorney General*

**Jason S. Miyares**  
Attorney General

202 North 9th Street  
Richmond, Virginia 23219  
804-786-2071  
FAX 804-786-1991  
Virginia Relay Services  
800-828-1120

**MEMORANDUM**

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

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

**DATE:** August 25, 2023

**SUBJECT:** Regulations Governing the Practice of Physical Therapy  
18VAC112-20-21

I have reviewed the proposed amendment to the Regulations Governing the Practice of Physical Therapy, 18VAC112-20-21, as adopted by the Board of Physical Therapy on May 11, 2023. The Board has the authority to adopt this amendment as an exempt regulatory action under Virginia Code § 2.2-4006(A)(4)(a) pursuant to the amendment made to Virginia Code § 54.1-3482(D) during the 2023 General Assembly Session. The proposed amendment is constitutional and does not conflict with existing federal or state laws or regulations.