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MEMORANDUM

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

FROM: James E. Rutkowski
Assistant Attorney General

DATE: June 19, 2017

SUBJECT: *Regulations Governing the Practice of Dentistry*
18VAC60-21

I have reviewed the proposed amendments to the *Regulations Governing the Practice of Dentistry*, 18VAC60-21, as adopted by the Board of Dentistry on June 9, 2017. These proposed amendments are emergency regulations promulgated pursuant to Virginia Code § 2.2-4011 following the declaration of an opioid addiction crisis public health emergency by the Virginia Department of Health on November 21, 2016. The Board of Dentistry has the statutory authority to promulgate these regulations under Virginia Code §§ 54.1-2400 and 54.1-2708.4. The proposed regulations are constitutional and do not conflict with existing federal or state laws or regulations.