



# COMMONWEALTH of VIRGINIA

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## MEMORANDUM

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

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

**DATE:** June 24, 2019

**SUBJECT:** *Delegation of Informal Fact-Finding to an Agency Subordinate*  
18VAC115-15

I have reviewed the amendment to the *Delegation of Informal Fact-Finding to an Agency Subordinate*, 18VAC115-15, as adopted by the Board of Counseling on May 31, 2019. The Board has the statutory authority to adopt the regulation under Virginia Code § 54.1-2400. The proposed amendment is constitutional and does not conflict with existing federal or state laws or regulations.