



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

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

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

**DATE:** April 21, 2023

**SUBJECT:** *Regulations Governing the Practice of Behavior Analysis*  
18VAC85-150

I have reviewed the proposed amendments to the *Regulations Governing the Practice of Behavior Analysis*, 18VAC85-150, as adopted by the Board of Medicine on October 6, 2022. The Board has the authority to adopt these regulations under Virginia Code §§ 54.1-2400 and 54.1-2957.16. The proposed amendments are constitutional and do not conflict with existing federal or state laws or regulations.