



# COMMONWEALTH of VIRGINIA

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## MEMORANDUM

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

**FROM:** Charis A. Mitchell  
Assistant Attorney General

**DATE:** August 3, 2020

**SUBJECT:** *Regulations Governing the Licensure of Massage Therapists*  
18 VAC 90-50-40

I have reviewed the proposed amendments to the *Regulations Governing the Licensure of Massage Therapists*, 18 VAC 90-50-40, that were adopted by the Board of Nursing on July 21, 2020. This action is exempt from the operation of the Administrative Process Act and review by the Executive Branch pursuant to Virginia Code § 2.2-4006(A)(4)(a), as these regulations are necessary to conform to changes in Virginia statutory law. The Board has the authority to adopt these regulations under Virginia Code § 54.1-2400. The proposed amendments are constitutional and do not conflict with existing federal or state laws or regulations.